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TRACY R. KIRKHAM (69912)
JOHN D. BOGDANOV (215830)
COOPER & KIRKHAM, P.C.
357 Tehama Street, Second Floor
San Francisco, CA 94103
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*Counsel for Class Representative Steven Ganz
And Indirect Purchaser Plaintiffs*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION.

Master File No. 3:07-cv-5944 JST

MDL No. 1917

This Document Relates to:
All Indirect-Purchaser Actions

**DECLARATION OF JOHN D.
BOGDANOV IN SUPPORT OF
OBJECTION OF COOPER &
KIRKHAM, P.C. TO LEAD COUNSEL'S
REVISED PROPOSED ALLOCATION
OF AGGREGATE FEE AWARD TO
INDIRECT PURCHASER PLAINTIFFS'
COUNSEL**

Judge: Honorable Jon S. Tigar

Before: Special Master Martin Quinn, JAMS

1 I, John D. Bogdanov, declare as follows:

2 1. I am a member in good standing of the State Bar of California. I am a partner in
3 Cooper & Kirkham, P.C. I have personal knowledge of the facts stated in this Declaration and, if
4 called as a witness, I could and would testify competently to them. I make this Declaration in
5 support of the "Objection of Cooper & Kirkham, P.C. to Lead Counsel's Revised Proposed
6 Allocation of Aggregate Fee Award to Indirect Purchaser Plaintiffs' Counsel."

7 2. I am 6 feet 4 inches tall and weigh approximately 235 pounds.

8 3. I billed 3,691.2 hours in *In re TFT-LCD (Flat-Panel) Antitrust Litigation*, No. 3:07-
9 MD-1827 SI (N.D. Cal.), up until the time the case finally settled with all defendants in that action
10 for \$1.1 billion. My experience in prosecuting the *TFT-LCD* action provided me with a
11 knowledge base which directly translated into efficiencies, insights, and an understanding of the
12 methods and strategies that would, and would not, be most efficient and beneficial to prosecuting
13 the *CRT* action on a day-to-day basis.
14

15 4. In *CRT*, I have worked on similar matters and had collegial relationships with many
16 of the same attorneys as prosecuted the *TFT-LCD* action, whose firms were awarded higher
17 multipliers in this action than Cooper & Kirkham.
18

19 5. I received 1,509 emails related to this action from Lauren Capurro, an attorney in
20 Lead Counsel's office, from mid-2010 through May 31, 2015.

21 6. Attached as Exhibits to this Declaration are unredacted and redacted emails or
22 email strings which I sent or received in the ordinary course of business. Information which has
23 been redacted is not being relied upon for this Objection, but rather is redacted to protect
24 confidential attorney work product or limit the introduction of superfluous matters into the record.
25

26 7. Attached hereto as Exhibit 1 is a true and correct copy of a partially redacted email
27 string dated September 29, 2010, sent and received in the ordinary course of business.
28

1 8. Attached hereto as Exhibit 2 is a true and correct copy of a partially redacted email
2 string dated on or about November 23, 2010, sent and received in the ordinary course of business.

3 9. Attached hereto as Exhibit 3 is a true and correct copy of a partially redacted email
4 string dated on February 11, 2011, sent and received in the ordinary course of business.

5 10. Attached hereto as Exhibit 4 is a true and correct copy of a partially redacted email
6 dated April 5, 2011, received in the ordinary course of business.

7 11. Attached hereto as Exhibit 5 is a true and correct copy of a partially redacted email
8 dated August 2, 2011, received in the ordinary course of business.

9 12. Attached hereto as Exhibit 6 is a true and correct copy of a partially redacted email
10 dated February 7, 2012, received in the ordinary course of business.

11 13. Attached hereto as Exhibit 7 is a true and correct copy of a partially redacted email
12 dated April 10, 2012, received in the ordinary course of business.

13 14. Attached hereto as Exhibit 8 is a true and correct copy of a partially redacted email
14 string dated July 26, 2012, received in the ordinary course of business.

15 15. Attached hereto as Exhibit 9 is a true and correct copy of a partially redacted email
16 dated July 27, 2012, received in the ordinary course of business.

17 16. Attached hereto as Exhibit 10 is a true and correct copy of a partially redacted
18 email dated September 17, 2012, received in the ordinary course of business.

19 17. Attached hereto as Exhibit 11 is a true and correct copy of a partially redacted
20 email dated February 12, 2013, received in the ordinary course of business.

21 18. Attached hereto as Exhibit 12 is a true and correct copy of a partially redacted
22 email string dated on or about March 26, 2013, sent and received in the ordinary course of
23 business.
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1 19. Attached hereto as Exhibit 13 is a true and correct copy of a partially redacted
2 email string dated on or about April 3, 2013, received in the ordinary course of business.

3 20. Attached hereto as Exhibit 14 is a true and correct copy of a partially redacted
4 email string dated on or about April 10, 2013, sent and received in the ordinary course of business.

5 21. Attached hereto as Exhibit 15 is a true and correct copy of an email dated April 10,
6 2013, received in the ordinary course of business.

7 22. Attached hereto as Exhibit 16 is a true and correct copy of an email dated April 11,
8 2013, received in the ordinary course of business.

9 23. Attached hereto as Exhibit 17 is a true and correct copy of a partially redacted
10 email string dated on or about June 19, 2013, sent and received in the ordinary course of business.

11 24. Attached hereto as Exhibit 18 is a true and correct copy of a partially redacted
12 email string dated on or about September 4, 2013, received in the ordinary course of business.

13 25. Attached hereto as Exhibit 19 is a true and correct copy of a partially redacted
14 email string dated on or about October 10, 2013, sent and received in the ordinary course of
15 business.

16 26. Attached hereto as Exhibit 20 is a true and correct copy of a partially redacted
17 email string dated on or about November 6, 2013, sent and received in the ordinary course of
18 business.

19 27. Attached hereto as Exhibit 21 is a true and correct copy of a partially redacted
20 email string dated on or about November 13, 2013, sent and received in the ordinary course of
21 business.

22 28. Attached hereto as Exhibit 22 is a true and correct copy of a partially redacted
23 email string dated on or about December 3, 2013, sent and received in the ordinary course of
24 business.

1 29. Attached hereto as Exhibit 23 is a true and correct copy of a partially redacted
2 email dated December 23, 2013, received in the ordinary course of business.

3 30. Attached hereto as Exhibit 24 is a true and correct copy of an email dated February
4 26, 2014, received in the ordinary course of business.

5 31. Attached hereto as Exhibit 25 is a true and correct copy of a partially redacted
6 email dated June 23, 2014, received in the ordinary course of business.

7 32. Attached hereto as Exhibit 26 is a true and correct copy of a partially redacted
8 email dated July 21, 2014, received in the ordinary course of business.

9 33. Attached hereto as Exhibit 27 is a true and correct copy of a partially redacted
10 email dated July 31, 2014, received in the ordinary course of business.

11 34. Attached hereto as Exhibit 28 is a true and correct copy of a partially redacted
12 email string dated July 31, 2014, received in the ordinary course of business.

13 35. Attached hereto as Exhibit 29 is a true and correct copy of a partially redacted
14 email string dated August 18, 2014, received in the ordinary course of business.

15 36. Attached hereto as Exhibit 30 is a true and correct copy of a partially redacted
16 email string dated on or about September 9, 2014, sent and received in the ordinary course of
17 business.

18 37. Attached hereto as Exhibit 31 is a true and correct copy of an email string dated on
19 or about September 12, 2014, sent and received in the ordinary course of business.

20 38. Attached hereto as Exhibit 32 is a true and correct copy of a partially redacted
21 email string dated on or about October 15, 2014, sent and received in the ordinary course of
22 business.

23 39. Attached hereto as Exhibit 33 is a true and correct copy of a partially redacted
24 email string dated on or about October 17, 2014, received in the ordinary course of business.
25
26
27
28

42. Attached hereto as Exhibit 36 is a true and correct copy of a partially redacted email dated November 21, 2014, received in the ordinary course of business.

44. Attached hereto as Exhibit 38 is a true and correct copy of a partially redacted email dated December 1, 2014, received in the ordinary course of business.

45. Attached hereto as Exhibit 39 is a true and correct copy of a partially redacted email string dated on or about December 4, 2014, received in the ordinary course of business.

46. Attached hereto as Exhibit 40 is a true and correct copy of an email dated December 29, 2014, received in the ordinary course of business.

47. Attached hereto as Exhibit 41 is a true and correct copy of an email dated January 21, 2015, received in the ordinary course of business.

48. Attached hereto as Exhibit 42 is a true and correct copy of an email dated March 9, 2015, received in the ordinary course of business.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 7th day of September, 2016, in San Francisco, California.

/s/ John D. Bogdanov
John D. Bogdanov

EXHIBIT 1

John Bogdanov

From: Lauren C. Russell <lauren russell@tatp.com>
Sent: Wednesday, September 29, 2010 3:09 PM
To: John Bogdanov
Subject: RE: CRT/Philips

Follow Up Flag: Follow up
Flag Status: Flagged

Thanks John. And thank you for all your hard work to date.

Best,

Lauren

Lauren C. Russell
Attorney at Law
Trump, Alioto, Trump & Prescott, LLP
2280 Union Street
San Francisco, CA 94123
Tel: (415) 563-7200
Fax: (415) 346-0679
E-mail: lauren russell@tatp.com

From: John Bogdanov [<mailto:jdb@coopkirk.com>]
Sent: Wednesday, September 29, 2010 2:01 PM
To: Lauren C. Russell
Subject: RE: CRT/Philips

[REDACTED]

[REDACTED]

[REDACTED]

From: Lauren C. Russell [<mailto:lauren russell@tatp.com>]
Sent: Wednesday, September 29, 2010 10:38 AM
To: John Bogdanov
Subject: CRT/Philips

[REDACTED]

[REDACTED]

[REDACTED]

Lauren C. Russell
Attorney at Law

Trump, Alioto, Trump & Prescott, LLP
2280 Union Street
San Francisco, CA 94123
Tel: (415) 563-7200
Fax: (415) 346-0679
E-mail: lauren russell@tatp.com

EXHIBIT 2

John Bogdanov

From: Lauren Russell <lauren russell@tatp.com>
Sent: Tuesday, November 23, 2010 12:24 PM
To: John Bogdanov; 'Neil Swartzberg'; 'Saveri, Rick'
Cc: malioto@tatp.com
Subject: RE: CRT/Philips

Follow Up Flag: Follow up
Flag Status: Flagged

John, this is great—thanks! I'm very happy I get to tick this off my to do list without any work on my part!

[REDACTED]

Lauren C. Russell
Attorney at Law
Trump, Alioto, Trump & Prescott, LLP
2280 Union Street
San Francisco, CA 94123
Telephone: (415) 563-7200
Facsimile: (415) 346-0679
E-mail: lauren russell@tatp.com

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From: John Bogdanov [<mailto:jdb@coopkirk.com>]
Sent: Tuesday, November 23, 2010 12:10 PM
To: Neil Swartzberg; Lauren Russell; 'Saveri, Rick'
Cc: malioto@tatp.com
Subject: RE: CRT/Philips

[REDACTED]

John D. Bogdanov
COOPER & KIRKHAM, P.C.
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From: Neil Swartzberg [<mailto:NSwartzberg@cpmlegal.com>]
Sent: Monday, November 22, 2010 5:53 PM

To: Lauren Russell; John Bogdanov; 'Saveri, Rick'

Cc: malioto@tatp.com

Subject: RE: CRT/Philips

[REDACTED]

Neil Swartzberg
Cotchett, Pitre & McCarthy
840 Malcolm Road, Suite 200
Burlingame, CA 94010
Telephone : (650) 697-6000
Fax: (650) 697-0577
nswartzberg@cpmlegal.com

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From: Lauren Russell [<mailto:lauren russell@tatp.com>]

Sent: Monday, November 22, 2010 4:11 PM

To: 'John Bogdanov'; Neil Swartzberg; 'Saveri, Rick'

Cc: malioto@tatp.com

Subject: CRT/Philips

[REDACTED]

Lauren C. Russell
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EXHIBIT 3

John Bogdanov

From: Lauren C. Russell <lauren russell@tatp.com>
Sent: Friday, February 11, 2011 8:17 PM
To: John Bogdanov
Subject: RE: CRT/Philips

Follow Up Flag: Follow up
Flag Status: Completed

Hi John,

Thanks for this. I like your proposed approach for our next steps with Philips and the missing custodians. [REDACTED]

[REDACTED]

Lauren

Lauren C. Russell
Attorney at Law
Trump, Alioto, Trump & Prescott, LLP
2280 Union Street
San Francisco, CA 94123
Tel: (415) 563-7200
Fax: (415) 346-0679
E-mail: lauren russell@tatp.com

From: John Bogdanov [mailto:jdb@coopkirk.com]
Sent: Friday, February 11, 2011 5:20 PM
To: Lauren Russell
Subject: RE: CRT/Philips

Lauren,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

John

John D. Bogdanov
COOPER & KIRKHAM, P.C.
357 Tehama Street, Second Floor
San Francisco, CA 94103
Telephone: 415-788-3030, Ext. 307
Facsimile: 415-882-7040
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From: Lauren Russell [<mailto:lauren russell@tatp.com>]
Sent: Friday, February 11, 2011 2:38 PM
To: John Bogdanov
Subject: RE: CRT/Philips

Thanks, John. This looks good to me. [REDACTED]

Lauren

Lauren C. Russell
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From: John Bogdanov [<mailto:jdb@coopkirk.com>]
Sent: Friday, February 11, 2011 1:57 PM
To: Lauren Russell
Subject: RE: CRT/Philips

Hi Lauren:

[REDACTED]

[REDACTED]

[REDACTED]

John

John D. Bogdanov
COOPER & KIRKHAM, P.C.
357 Tehama Street, Second Floor
San Francisco, CA 94103
Telephone: 415-788-3030, Ext. 307
Facsimile: 415-882-7040
email: jdb@coopkirk.com

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From: Lauren Russell [mailto:lauren russell@tatp.com]
Sent: Friday, February 11, 2011 11:56 AM
To: John Bogdanov
Subject: CRT/Philips

Hi John:

[REDACTED]

Lauren

Lauren C. Russell
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Facsimile: (415) 346-0679
E-mail: lauren russell@tatp.com

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EXHIBIT 4


John Bogdanov

From: Lauren Russell <lauren russell@tatp.com>
Sent: Tuesday, April 05, 2011 11:26 AM
To: 'Qianwei Fu'; Sylvie Kern; 'Dan Birkhaeuser'; Jennifer Rosenberg; Jennie Anderson; Jessica Moy; 'Marvin A. Miller'; 'Nathan Cihlar'; Shinae Kim-Helms; John Bogdanov
Cc: Demetrius Lambrinos; Eric P. Mandel
Subject: CRT/Cast of Characters
Attachments: Cast of Characters List.XLS

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Counsel:

Attached please find the Cast of Characters list that we have compiled with your help. As you will see, the lists for some of the defendants are extremely long. We want to make the lists more manageable before presenting them to the defendants and asking them to search for the names. Therefore, we ask that each of you go through the list for your defendant(s) and choose 30 "core" people.



Best,

Lauren

Lauren C. Russell
Attorney at Law
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San Francisco, CA 94123
Telephone: (415) 563-7200
Facsimile: (415) 346-0679
E-mail: lauren russell@tatp.com

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EXHIBIT 5

John Bogdanov

From: Lauren Russell <lauren russell@tatp.com>
Sent: Tuesday, August 02, 2011 6:34 PM
To: 'Nathan Cihlar'; 'Qianwei Fu'; Demetrius Lambrinos; 'Marvin A. Miller'; 'Dan Birkhaeuser'; Jennie Lee Anderson; John Bogdanov; Sylvie Kern
Cc: malioto@tatp.com
Subject: CRT/Defendant Memoranda

Follow Up Flag: Follow up
Flag Status: Flagged

Hi everyone,

We are in the process of starting the document review in this case. In order to help bring the document reviewers up-to-speed on the facts of this case and, in particular, the facts relating to each of the defendants, I would like each of you to prepare a detailed memo regarding your defendant(s) and what you have learned during the meet and confer process. The memo will also be a useful reference for us in the event the defendants' productions are deficient in any way. [REDACTED]

[REDACTED]

[REDACTED]

Best,

Lauren

Lauren C. Russell
Attorney at Law
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San Francisco, CA 94123
Telephone: (415) 563-7200
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E-mail: lauren russell@tatp.com

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EXHIBIT 6

John Bogdanov

From: Lauren Russell <LaurenRussell@tatp.com>
Sent: Tuesday, February 07, 2012 10:53 AM
To: 'Dan Birkhaeuser'; Jennifer Rosenberg; Jennie Lee Anderson; Jessica Moy; ncihlar@straus-boies.com; Thomas Palumbo; Shinae Kim-Helms; Sylvie Kern; 'Qianwei Fu'; John Bogdanov
Cc: Demetrius Lambrinos; JZahid@zelle.com; Richie, Marcellus
Subject: CRT/Transactional Data
Attachments: memo re Defendant Data Comments 20110602.doc

Follow Up Flag: Follow up
Flag Status: Flagged

Hi Everyone,

As the attorneys responsible for the meet and confers with defendants, you should be up to date on the status of the data negotiations with your defendant(s).

[illegible]

[REDACTED]
[REDACTED] I
realize I've been asking a lot of some of you recently, but I really need your help to follow up with the defendants and help Demetrius. [REDACTED]
[REDACTED]

Thanks.

Lauren

Lauren C. Russell
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Facsimile: (415) 346-0679
E-mail: lauren russell@tntp.com

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EXHIBIT 7

John Bogdanov

From: Lauren Russell <LaurenRussell@tatp.com>
Sent: Tuesday, April 10, 2012 10:45 PM
To: Demetrius Lambrinos; 'Dan Birkhaeuser'; John Bogdanov; Jennie Lee Anderson; Jessica Moy; Sylvie Kern; 'Qianwei Fu'; 'Nathan Cihlar'; Shinae Kim-Helms; Jennifer Rosenberg
Subject: CRT/Proposed percipient witness lists for each defendant
Attachments: FBB1-#64300-v1-potential_CAP_PROD_deponents.docx; FTAIA Deponent Witnesses3 040512.doc; Impact Team--LONG list of deponents.docx; Impact Team--Short list of deponents.docx; Potential Deponents_pricing team_040612.xls; Potential deponent list; Order re Discovery and Case Management Protocol 4.3.12.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Hello All,

[REDACTED]

[REDACTED]

[REDACTED]

I realize that we've been asking a lot of you recently and I very much appreciate the hard work you've been putting into this case. But unfortunately it's imperative that we undertake this work so that we're ready for class certification. I hope you understand and realize that this push will be short-lived and will be worth it. Thank you.

Best,

Lauren

Lauren C. Russell
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San Francisco, CA 94123

Telephone: (415) 563-7200

Facsimile: (415) 346-0679

E-mail: lauren russell@tatp.com

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EXHIBIT 8

John Bogdanov

From: Lauren Russell <LaurenRussell@tatp.com>
Sent: Thursday, July 26, 2012 11:21 AM
To: 'Michael Christian'
Cc: lauren russell@tatp.com; John Bogdanov; Judith Zahid
Subject: RE: Phillips data

Follow Up Flag: Follow up
Flag Status: Flagged

Hi Mike,

I'm copying John Bogdanov since he is the Philips discovery guy, and Judith, since she is taking the Philips 30b6 dep next week.

[REDACTED]

[REDACTED]

[REDACTED]

From: Michael Christian [<mailto:MChristian@zelle.com>]
Sent: Thursday, July 26, 2012 10:50 AM
To: lauren russell@tatp.com
Subject: Phillips data

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

EXHIBIT 9

John Bogdanov

From: Lauren Russell <LaurenRussell@tatp.com>
Sent: Friday, July 27, 2012 4:03 PM
To: John Bogdanov
Cc: Judith Zahid; lauren russell@tatp.com
Subject: CRT/Philips rogs & dep summaries

Follow Up Flag: Follow up
Flag Status: Flagged

Hi John,

I'm sorry to bother you as I know you're busy preparing for the Philips deps right now but I'm trying to make some assignments so everything is covered for the run up to class cert. Can you please let me know if you will be able to handle the following assignments when you get back from DC:

[REDACTED]

[REDACTED]

Best,

Lauren

Lauren C. Russell
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2280 Union Street
San Francisco, CA 94123
Telephone: (415) 563-7200
Facsimile: (415) 346-0679
E-mail: lauren russell@tatp.com

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EXHIBIT 10

John Bogdanov

From: Lauren Russell <LaurenRussell@tatp.com>
Sent: Monday, September 17, 2012 10:43 PM
To: John Bogdanov
Cc: Sylvie Kern; lauren russell@tatp.com; Mario N. Alioto
Subject: CRT/Research re Thomson
Attachments: Final IPP Motion for Leave to Amend Complaint 8.22.12.pdf; Clean Proposed Fourth CAC.pdf; Thomson Opp to Mtn to Amend.pdf; CRT Conspiracy Meetings Grid 2012_09_03.xlsx

Importance: High

Follow Up Flag: Follow up
Flag Status: Flagged

Hi John,

I have a research project/doc review project that I'm hoping you can help with.

As you may be aware, we recently filed a motion to amend to add Thomson, Mitsubishi and Videocon as defendants. [REDACTED]

[REDACTED] We would like to moot these arguments by showing that the court has personal jurisdiction over Thomson S.A. We would like you to see if you can find us some evidence on this.

[REDACTED]

[REDACTED]

Thanks!

Lauren

Lauren C. Russell
Attorney at Law
Trump, Alioto, Trump & Prescott, LLP
2280 Union Street
San Francisco, CA 94123

Telephone: (415) 563-7200

Facsimile: (415) 346-0679

E-mail: lauren russell@tatp.com

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EXHIBIT 11

John Bogdanov

From: Lauren Capurro (Russell) <LaurenRussell@tatp.com>
Sent: Tuesday, February 12, 2013 11:49 AM
To: Bob Gralewski; Ike Diel; Demetrius Lambrinos; Brian S. Umpierre; Brian Cullen; Jennie Lee Anderson; Jennifer Rosenberg; dbirkhaeuser@bramsonplutzik.com; John Bogdanov; Shinae Kim-Helms; akikuchi@kmlp.com; Jessica Moy; Thomas Palumbo; Sylvie Kern
Cc: ncihlar@strauss-boies.com
Subject: CRT/Call re Deposition Prep Protocol, Tomorrow at 12:00 pm Pacific

Importance: High

Follow Up Flag: Follow up
Flag Status: Flagged

Hello Everyone:

Now that merit depositions are underway, we would like to have a call with team leaders [REDACTED]

[REDACTED]
[REDACTED] regarding some modifications to the deposition preparation protocols that are currently in place. [REDACTED]
[REDACTED]

[REDACTED]

[REDACTED]

English team leaders responsible for a deponent will now be primarily responsible for drafting memoranda explaining the role of the deponent (i.e. background memoranda) as well as outlining the best documents found for use at deposition (i.e. preparation memoranda). [REDACTED]
[REDACTED]

[REDACTED]

[REDACTED] the English team leaders will be responsible for preparing a full preparation memoranda detailing, *inter alia*, the role of the deponent, their background, documents for use in deposition, etc. [REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

4. [REDACTED]

In short, we need the English team leaders to take responsibility for overseeing and coordinating the preparation for your team's assigned deponent. We believe this is necessary to ensure there is better communication among the English review team leader, the foreign review team and the deposition taking team, and to ensure that things don't fall through the cracks. We also believe these changes will both help to reduce the burden on our foreign review team [REDACTED]

[REDACTED]

[REDACTED]

Best,

Lauren

Lauren C. Capurro (Russell)
Attorney at Law
Trump, Alioto, Trump & Prescott, LLP
2280 Union Street
San Francisco, CA 94123
Telephone: (415) 563-7200
Facsimile: (415) 346-0679
E-mail: lauren russell@tatp.com

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EXHIBIT 12

John Bogdanov

From: Lauren C. Russell <lauren russell@tatp.com>
Sent: Tuesday, March 26, 2013 8:42 PM
To: John Bogdanov
Cc: lauren russell@tatp.com
Subject: Re: CRT/Philips

Follow Up Flag: Follow up
Flag Status: Flagged

Thanks, John. I thought I'd seen something somewhere about a Philips office in San Diego. That's great!

On Tue, 26 Mar 2013 17:22:42 -0700

John Bogdanov <jdb@coopkirk.com> wrote:

> Lauren -

>

[REDACTED]

[REDACTED]

>

> John

>

> From: Lauren C. Russell [mailto:lauren russell@tatp.com]

> Sent: Monday, March 25, 2013 12:46 PM

> To: John Bogdanov

> Cc: lauren russell@tatp.com

> Subject: Re: CRT/Philips

>

> Hi John, this is excellent. Thanks so much for being so
> thorough. [REDACTED]

[REDACTED]

[REDACTED]

>
> On Thu, 21 Mar 2013 17:04:55 -0700
> John Bogdanov
><jdb@coopkirk.com<mailto:jdb@coopkirk.com>> wrote:
>> Lauren,
>>
>> Here is some additional information from which to pick
>>and choose. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

>>

[REDACTED]

[REDACTED]

>>
>> John D. Bogdanov
>> COOPER & KIRKHAM, P.C.
>> 357 Tehama Street, Second Floor
>> San Francisco, CA 94103
>> Telephone: 415-788-3030, Ext. 307
>> Facsimile: 415-882-7040
>> email:
>> jdb@coopkirk.com<mailto:jdb@coopkirk.com<mailto:jdb@coopkirk.com%3cmailto:jdb@coopkirk.com>>
>>
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>>
>> From: Lauren Capurro (Russell)
>> [mailto:LaurenRussell@tatp.com]
>> Sent: Thursday, March 21, 2013 11:24 AM
>> To: John Bogdanov
>> Subject: RE: CRT/Philips
>>
>> John, this is great. Thanks so much!

>>

>> Lauren C. Capurro (Russell)

>> Attorney at Law

>> Trump, Alioto, Trump & Prescott, LLP

>> 2280 Union Street

>> San Francisco, CA 94123

>> Tel: (415) 563-7200

>> Fax: (415) 346-0679

>> E-mail:

>> lauren russell@tatp.com<mailto:lauren russell@tatp.com<mailto:lauren russell@tatp.com%3cmailto:lauren russell@tatp.c
om>>

>>

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>>

>> From: John Bogdanov [mailto:jdb@coopkirk.com]

>> Sent: Thursday, March 21, 2013 9:08 AM

>> To: Lauren Capurro (Russell)

>> Subject: RE: CRT/Philips

>>

>> Hi Lauren,

>>

>> Here is a first installment of some quick facts. There

>> is relevant information regarding each of the other

>> issues you note [REDACTED]

[REDACTED]

[REDACTED]

>>
>> John
>>
>>From: Lauren Capurro (Russell)
>>[mailto:LaurenRussell@tatp.com]
>> Sent: Wednesday, March 20, 2013 12:42 PM
>> To: John Bogdanov
>> Cc:
>>lauren russell@tatp.com<mailto:lauren russell@tatp.com<mailto:lauren russell@tatp.com%3cmailto:lauren russell@tatp.c
om>>
>> Subject: CRT/Philips
>>
>> Hi John,
>>
>> I'm working on opposing the CA AG's motion for
>>preliminary approval of their settlement with Philips. I
>>would like to be able to briefly state some facts
>>regarding Philips' market share and their role in the
>>conspiracy (e.g., how many meetings they attended,
>>attended meetings in the U.S., their leadership of the
>>meetings etc.) to show the Judge that the \$500,000
>>settlement with Philips is inadequate. If you have any
>>facts that would be useful to me, can you please shoot
>>them over? Thanks.
>>
>> Lauren
>>
>> Lauren C. Capurro (Russell)
>> Attorney at Law
>> Trump, Alioto, Trump & Prescott, LLP
>> 2280 Union Street
>> San Francisco, CA 94123
>> Telephone: (415) 563-7200
>>Facsimile: (415) 346-0679
>> E-mail:
>>lauren russell@tatp.com<mailto:lauren russell@tatp.com<mailto:lauren russell@tatp.com%3cmailto:lauren russell@tatp.c
om>>
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>>

EXHIBIT 13

John Bogdanov

From: Lauren Capurro (Russell) <LaurenRussell@tatp.com>
Sent: Wednesday, April 03, 2013 10:30 AM
To: akikuchi@kmlp.com; Bob Gralewski; Brian Cullen; Brian S. Umpierre;
dbirkhaeuser@bramsonplutzik.com; Ike Diel; Jennie Lee Anderson; Jennifer Rosenberg;
Jessica Moy; Liz McKenna; Natalie Kabasakalian; ncihlar@straus-boies.com; Shinae Kim-
Helms; Sylvie Kern; Thomas Palumbo; John Bogdanov; Demetrius Lambrinos
Subject: RE: CRT/Deposition Preparation Coding Manual + Team Status
Attachments: Depo Prep 03.26.2013.xlsx; CRT--IPP Deposition Prep Teams 4.1.13.doc
Follow Up Flag: Follow up
Flag Status: Flagged

Hello again,

[REDACTED]

[REDACTED]

[REDACTED]
[REDACTED] Going forward, we will be expecting you, as the team leaders for your defendants, to be making recommendations to Nate & I regarding which deponents your team should work on next. [REDACTED]

[REDACTED]

[REDACTED]

Lauren

Lauren C. Capurro (Russell)
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San Francisco, CA 94123
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E-mail: lauren russell@t ATP.com

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From: Lauren Capurro (Russell) [<mailto:LaurenRussell@t ATP.com>]
Sent: Monday, April 01, 2013 2:36 PM
To: akikuchi@kmlp.com; Bob Galewski; Brian Cullen (bwc@classcounsel.com); Brian S. Umpierre; dbirkhaeuser@bramsonplutzik.com; Ike Diel; Jennie Lee Anderson; Jennifer Rosenberg; Jessica Moy (jessica.moy@andrusanderson.com); Liz McKenna; Natalie Kabasakalian; ncihlar@strauss-boies.com; Shinae Kim-Helms (Skimhelms@strauss-boies.com); Sylvie Kern (sylviekern@yahoo.com); Thomas Palumbo (tpalumbo@strauss-boies.com)
Subject: CRT/Deposition Preparation Coding Manual + Team Status

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Lauren C. Capurro (Russell)
Attorney at Law
Trump, Alioto, Trump & Prescott, LLP
2280 Union Street
San Francisco, CA 94123
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Facsimile: (415) 346-0679
E-mail: lauren russell@t ATP.com

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EXHIBIT 14

John Bogdanov

From: Lauren Capurro (Russell) <LaurenRussell@tatp.com>
Sent: Wednesday, April 10, 2013 7:54 AM
To: 'Anne Nardacci'
Cc: John Bogdanov
Subject: RE: CRT -- Chunghwa / Tatung Discovery

Follow Up Flag: Follow up
Flag Status: Flagged

Hi Anne,

[REDACTED] I've copied John Bogdanov, who is the team leader for Philips and who has led our discovery negotiations with Philips for the last few years. [REDACTED]

Lauren

Lauren C. Capurro (Russell)
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E-mail: lauren russell@tatp.com

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From: Anne Nardacci [mailto:anardacci@BSFLLP.com]
Sent: Tuesday, April 02, 2013 6:35 PM
To: 'Lauren Capurro (Russell)'
Subject: RE: CRT -- Chunghwa / Tatung Discovery

[REDACTED]

-----Original Message-----

From: Lauren Capurro (Russell) [LaurenRussell@tatp.com]
Sent: Tuesday, April 02, 2013 05:26 PM Eastern Standard Time
To: Anne Nardacci
Subject: RE: CRT -- Chunghwa / Tatung Discovery

[REDACTED]

[REDACTED]

Lauren C. Capurro (Russell)
Attorney at Law
Trump, Alioto, Trump & Prescott, LLP
2280 Union Street
San Francisco, CA 94123
Tel: (415) 563-7200
Fax: (415) 346-0679
E-mail: lauren russell@tntp.com

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From: Anne Nardacci [<mailto:anardacci@BSFLLP.com>]
Sent: Tuesday, April 02, 2013 10:57 AM
To: 'Lauren Capurro (Russell)'
Subject: RE: CRT -- Chunghwa / Tatung Discovery

[REDACTED]

From: Lauren Capurro (Russell) [<mailto:LaurenRussell@tntp.com>]
Sent: Tuesday, April 02, 2013 1:57 PM
To: Anne Nardacci
Subject: RE: CRT -- Chunghwa / Tatung Discovery

[REDACTED]

Lauren C. Capurro (Russell)
Attorney at Law
Trump, Alioto, Trump & Prescott, LLP
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Fax: (415) 346-0679
E-mail: lauren russell@tntp.com

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From: Anne Nardacci [<mailto:anardacci@BSFLLP.com>]
Sent: Monday, April 01, 2013 3:01 PM
To: 'Lauren Capurro (Russell)'
Subject: RE: CRT -- Chunghwa / Tatung Discovery

[REDACTED]

From: Lauren Capurro (Russell) [<mailto:LaurenRussell@tntp.com>]
Sent: Monday, April 01, 2013 5:57 PM
To: Anne Nardacci
Subject: RE: CRT -- Chunghwa / Tatung Discovery

[REDACTED]

[REDACTED]

[REDACTED]

Lauren C. Capurro (Russell)
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Fax: (415) 346-0679
E-mail: lauren russell@tntp.com

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From: Anne Nardacci [<mailto:anardacci@BSFLLP.com>]
Sent: Monday, April 01, 2013 2:50 PM
To: 'Lauren Capurro (Russell)'; 'Nathan Cihlar'
Cc: Kyle Smith
Subject: RE: CRT -- Chunghwa / Tatung Discovery

[REDACTED]

From: Lauren Capurro (Russell) [<mailto:LaurenRussell@tntp.com>]
Sent: Monday, April 01, 2013 5:47 PM
To: Anne Nardacci; 'Nathan Cihlar'

Cc: Kyle Smith

Subject: RE: CRT -- Chunghwa / Tatung Discovery

[REDACTED]

Lauren

Lauren C. Capurro (Russell)

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E-mail: lauren russell@tntp.com

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From: Anne Nardacci [<mailto:anardacci@BSFLLP.com>]

Sent: Monday, April 01, 2013 12:22 PM

To: 'Lauren Capurro (Russell)'; 'Nathan Cihlar'

Cc: Kyle Smith

Subject: RE: CRT -- Chunghwa / Tatung Discovery

[REDACTED]

[REDACTED]

From: Lauren Capurro (Russell) [<mailto:LaurenRussell@tntp.com>]

Sent: Monday, April 01, 2013 3:02 PM

To: Anne Nardacci; 'Nathan Cihlar'

Cc: Kyle Smith

Subject: RE: CRT -- Chunghwa / Tatung Discovery

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Best,

Lauren

Lauren C. Capurro (Russell)
Attorney at Law
Trump, Alioto, Trump & Prescott, LLP
2280 Union Street
San Francisco, CA 94123
Tel: (415) 563-7200
Fax: (415) 346-0679
E-mail: laurenrussell@tatp.com

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From: Anne Nardacci [<mailto:anardacci@BSFLLP.com>]
Sent: Monday, March 25, 2013 12:50 PM
To: Lauren Capurro (Russell); Nathan Cihlar
Cc: Kyle Smith
Subject: CRT -- Chunghwa / Tatung Discovery

[REDACTED]

[REDACTED]

[REDACTED]

Anne Nardacci, Esq.
Boies, Schiller & Flexner LLP
10 North Pearl Street
Albany, New York 12207
(518) 434-0600
(518) 434-0665 (fax)
www.bsflp.com

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EXHIBIT 15

John Bogdanov

From: Lauren Capurro (Russell) <LaurenRussell@tatp.com>
Sent: Wednesday, April 10, 2013 8:28 AM
To: Karina Kosharskyy
Cc: John Bogdanov; Bob Gralewski; ncihlar@strauss-boies.com
Subject: CRT/Philips Doc Review

Follow Up Flag: Follow up
Flag Status: Flagged

Hi Karina,

We'd like to move you to another team to work on preparing for some Philips depositions. John Bogdanov, copied on this message, is the team leader for the Philips doc review team. John has been working on Philips discovery issues since 2010, so he is very familiar with the players. He will be in touch to get you started.

Best,

Lauren

Lauren C. Capurro (Russell)
Attorney at Law
Trump, Alioto, Trump & Prescott, LLP
2280 Union Street
San Francisco, CA 94123
Telephone: (415) 563-7200
Facsimile: (415) 346-0679
E-mail: lauren russell@tatp.com

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EXHIBIT 16

John Bogdanov

From: Lauren Capurro (Russell) <LaurenRussell@tatp.com>
Sent: Thursday, April 11, 2013 2:23 PM
To: dpritchard@vmbllp.com
Cc: John Bogdanov; Brian S. Umpierre
Subject: CRT/Philips & LGE Depositions

Follow Up Flag: Follow up
Flag Status: Flagged

Hi Diane,

I'm following up on my voicemail to you earlier today regarding Philips and LGE depositions. I have copied John Bogdanov (Philips) and Brian Umpierre (LGE), who have been working on Philips and LGE discovery matters for some time and who are leading the document review teams in finding evidence for the depositions. I think the first step should be for John and Brian to send you some background materials on each defendant, as well as a description of where we are in the process of scheduling depositions. Once you've had a chance to review those materials, you can let us know if you have any questions and we can loop you in on all calls/emails related to the deposition preparations.

We look forward to working with you.

Best,

Lauren

Lauren C. Capurro (Russell)
Attorney at Law
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2280 Union Street
San Francisco, CA 94123
Telephone: (415) 563-7200
Facsimile: (415) 346-0679
E-mail: lauren russell@tatp.com

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EXHIBIT 17

John Bogdanov

From: Lauren Capurro <LaurenRussell@tatp.com>
Sent: Wednesday, June 19, 2013 7:50 PM
To: John Bogdanov
Subject: Fwd: CRT - Philips

Follow Up Flag: Follow up
Flag Status: Flagged

[REDACTED] Can you please review & let me know if there look like there are issues with anything they withheld? Thanks.

Sent from my iPhone

Begin forwarded message:

From: <charles.malaise@bakerbotts.com>
Date: June 19, 2013, 6:12:50 PM PDT
To: <jdb@coopkirk.com>
Cc: <john.taladay@bakerbotts.com>, <erik.koons@bakerbotts.com>, <tiffany.gelott@bakerbotts.com>, <lauren russell@tatp.com>
Subject: RE: CRT - Philips

John,

[REDACTED]

[REDACTED]

Regards,

Charles Malaise
Associate | **Baker Botts L.L.P.**
1299 Pennsylvania Avenue, N.W.
Washington, DC 20004-2400
202.639.1117 (direct)
202.585.1037 (fax)
charles.malaise@bakerbotts.com

From: John Bogdanov [<mailto:jdb@coopkirk.com>]
Sent: Tuesday, June 18, 2013 5:38 PM
To: Taladay, John
Cc: Emanuelson, David; Malaise, Charles; Koons, Erik; Lauren Capurro (Russell)
Subject: CRT - Philips

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

John D. Bogdanov
COOPER & KIRKHAM, P.C.
357 Tehama Street, Second Floor
San Francisco, CA 94103
Telephone: 415-788-3030, Ext. 307
Facsimile: 415-882-7040
email: jdb@coopkirk.com

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<2012.08.03 - Malaise Ltr to Plaintiffs re Supplemental Doc Production and Privilege Logs.pdf>

EXHIBIT 18

John Bogdanov

From: Lauren Capurro (Russell) <LaurenRussell@tatp.com>
Sent: Wednesday, September 04, 2013 12:11 PM
To: John Bogdanov
Subject: FW: CRT/Opt out form for Ganz
Attachments: EXCLUSION FORM.pdf

Importance: High

Follow Up Flag: Follow up
Flag Status: Flagged

Hi John,

I'm sorry to be changing things up at the last minute, but we're thinking that it may be better to have Ganz opt out of the CA AG's settlement and attempt to opt out the entire class. To that end, can you please complete the attached form, have Mr. Ganz sign it & return it to me by tomorrow? We will need to mail it on Friday. Let me know if you have any questions. Thanks!

Lauren

Lauren C. Capurro (Russell)
Attorney at Law
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2280 Union Street
San Francisco, CA 94123
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Fax: (415) 346-0679
E-mail: lauren russell@tatp.com

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From: Sylvie Kern [<mailto:sylviekern@yahoo.com>]
Sent: Tuesday, September 03, 2013 11:28 PM
To: Lauren Capurro; Joe Patane
Subject: Re: CRT/Opt out form for Ganz

Sylvie K. Kern
KAG Law Group
P.O. Box 210135
San Francisco, CA 94121
(415) 221-5763
www.antitrustglobal.com

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From: Lauren Capurro <LaurenRussell@tatp.com>
To: Joe Patane <jpatane@tatp.com>
Cc: "Sylvie Kern" <sylviekern@yahoo.com>
Sent: Tuesday, September 3, 2013 10:57 PM
Subject: Re: CRT/Opt out form for Ganz

[REDACTED]

Sent from my iPhone

On Sep 3, 2013, at 10:27 PM, Joe Patane <jpatane@tatp.com> wrote:

[REDACTED]

Sent from my iPhone.

On Sep 3, 2013, at 9:43 PM, "Lauren Capurro \ (Russell)" <LaurenRussell@tatp.com> wrote:

[REDACTED]

[REDACTED]

[REDACTED]

Lauren C. Capurro (Russell)
Attorney at Law
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2280 Union Street
San Francisco, CA 94123
Tel: (415) 563-7200
Direct line: (415) 447-1496
Cell: (415) 860-5051
Fax: (415) 346-0679
E-mail: lauren russell@tatp.com

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EXHIBIT 19

John Bogdanov

From: Lauren Capurro (Russell) <LaurenRussell@tatp.com>
Sent: Thursday, October 10, 2013 1:15 PM
To: John Bogdanov
Cc: Brian S. Umpierre; Diane Pritchard
Subject: RE: CRT/Investigator to find former employees
Attachments: MPA ISO Final Approval of Philips & CPT Settlements.pdf; OPPOSITION OF OBJECTOR JEFFREY FIGONE TO MOTION FOR FINAL APPROVAL OF PHILIPS SETTLEMENT [UNREDACTED].pdf

Follow Up Flag: Follow up
Flag Status: Flagged

[REDACTED]

Given Philips' recalcitrance during our custodian negotiations and the fact that we obviously couldn't trust their representations that there was no one else of interest, we need to review all Philips/LPD docs with a view to identifying potential witnesses/custodians that aren't on our custodian lists.

I'm copying Brian Umpierre here because I've piled a lot onto you in the last day or so and you're going to have a lot of work on Philips deps over the next few months, so I think it makes sense to bring Brian on board as your co-team leader for Philips/LPD. Obviously Brian has a good background in LPD from the LG side of things. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Lauren

Lauren C. Capurro (Russell)
Attorney at Law
Trump, Alioto, Trump & Prescott, LLP
2280 Union Street
San Francisco, CA 94123
Tel: (415) 563-7200
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E-mail: lauren russell@tatp.com

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From: John Bogdanov [<mailto:jdb@coopkirk.com>]
Sent: Thursday, October 10, 2013 11:38 AM
To: Lauren Capurro (Russell)
Subject: RE: CRT/Investigator to find former employees

[REDACTED]

John D. Bogdanov
COOPER & KIRKHAM, P.C.
357 Tehama Street, Second Floor
San Francisco, CA 94103
Telephone: 415-788-3030, Ext. 307
Facsimile: 415-882-7040
email: jdb@coopkirk.com

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From: Lauren Capurro (Russell) [<mailto:LaurenRussell@tatp.com>]
Sent: Thursday, October 10, 2013 11:20 AM
To: John Bogdanov
Subject: RE: CRT/Investigator to find former employees

[REDACTED]

Lauren C. Capurro (Russell)
Attorney at Law
Trump, Alioto, Trump & Prescott, LLP
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From: John Bogdanov [<mailto:jdb@coopkirk.com>]
Sent: Thursday, October 10, 2013 11:13 AM
To: Lauren Capurro (Russell)
Subject: RE: CRT/Investigator to find former employees

[REDACTED]

John D. Bogdanov
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From: Lauren Capurro (Russell) [<mailto:LaurenRussell@tntp.com>]
Sent: Thursday, October 10, 2013 10:58 AM
To: John Bogdanov
Subject: RE: CRT/Investigator to find former employees

[REDACTED]

[REDACTED]

Lauren C. Capurro (Russell)
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From: John Bogdanov [<mailto:jdb@coopkirk.com>]
Sent: Thursday, October 10, 2013 10:24 AM
To: Lauren Capurro (Russell)
Subject: RE: CRT/Investigator to find former employees

[REDACTED]

[REDACTED]

John D. Bogdanov

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From: Lauren Capurro (Russell) [<mailto:LaurenRussell@tntp.com>]

Sent: Wednesday, October 09, 2013 4:27 PM

To: John Bogdanov

Subject: RE: CRT/Investigator to find former employees

[REDACTED]

Lauren

Lauren C. Capurro (Russell)
Attorney at Law
Trump, Alioto, Trump & Prescott, LLP
2280 Union Street

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From: John Bogdanov [<mailto:jdb@coopkirk.com>]
Sent: Wednesday, October 09, 2013 11:54 AM
To: Lauren Capurro (Russell)
Subject: RE: CRT/Investigator to find former employees

[REDACTED]

[REDACTED]

[REDACTED]

John D. Bogdanov
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From: Lauren Capurro (Russell) [<mailto:LaurenRussell@tntp.com>]
Sent: Tuesday, October 08, 2013 5:14 PM
To: John Bogdanov
Subject: RE: CRT/Investigator to find former employees

[REDACTED]

[REDACTED]

Lauren C. Capurro (Russell)
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From: John Bogdanov [<mailto:jdb@coopkirk.com>]
Sent: Tuesday, October 08, 2013 4:22 PM
To: Lauren Capurro (Russell)
Subject: RE: CRT/Investigator to find former employees

[REDACTED]

[REDACTED]


[REDACTED]

[REDACTED]

John D. Bogdanov
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From: Lauren Capurro (Russell) [<mailto:LaurenRussell@tntp.com>]
Sent: Tuesday, October 08, 2013 3:09 PM
To: John Bogdanov
Subject: RE: CRT/Investigator to find former employees



Lauren C. Capurro (Russell)
Attorney at Law
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E-mail: laurenrussell@tntp.com

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From: John Bogdanov [<mailto:jdb@coopkirk.com>]
Sent: Wednesday, September 25, 2013 4:26 PM
To: Jennie Anderson; Nathan Cihlar; Lauren Capurro (Russell)
Cc: dbirkhaeuser@bramsonplutzik.com; Jennifer Rosenberg; Demetrius X. Lambrinos; Brian S. Umpierre; Bob Gralewski
Subject: RE: CRT/Investigator to find former employees



John D. Bogdanov
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From: Jennie Anderson [<mailto:jennie@andrusanderson.com>]
Sent: Wednesday, September 25, 2013 1:12 PM
To: Nathan Cihlar; Lauren Capurro (Russell)
Cc: dbirkhaeuser@bramsonplutzik.com; Jennifer Rosenberg; Demetrius X. Lambrinos; John Bogdanov; Brian S. Umpierre; Bob Gralewski
Subject: RE: CRT/Investigator to find former employees

[REDACTED]

From: Nathan Cihlar [<mailto:ncihlar@strauss-boies.com>]

Sent: Wednesday, September 25, 2013 11:04 AM

To: Lauren Capurro (Russell); Jennie Anderson

Cc: dbirkhaeuser@bramsonplutzik.com; 'Jennifer Rosenberg'; 'Demetrius X. Lambrinos'; 'John Bogdanov'; Brian S. Umpierre; Bob Gralewski

Subject: RE: CRT/Investigator to find former employees

[REDACTED]

[REDACTED]

[REDACTED]

From: Lauren Capurro (Russell) [<mailto:LaurenRussell@tntp.com>]

Sent: Monday, September 23, 2013 7:30 PM

To: 'Jennie Anderson'

Cc: dbirkhaeuser@bramsonplutzik.com; 'Jennifer Rosenberg'; 'Demetrius X. Lambrinos'; Nathan Cihlar; 'John Bogdanov'; Brian S. Umpierre; Bob Gralewski

Subject: RE: CRT/Investigator to find former employees

Importance: High

[REDACTED]

[REDACTED]

Lauren C. Capurro (Russell)

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From: Jennie Anderson [<mailto:jennie@andrusanderson.com>]

Sent: Monday, September 23, 2013 3:45 PM

To: Lauren Capurro (Russell)

Cc: dbirkhaeuser@bramsonplutzik.com; Jennifer Rosenberg; Demetrius X. Lambrinos; ncihlar@strauss-boies.com

Subject: RE: CRT/Investigator to find former employees

From: Lauren Capurro (Russell) [<mailto:LaurenRussell@tntp.com>]

Sent: Wednesday, September 18, 2013 5:50 PM

To: Jennie Anderson

Cc: dbirkhaeuser@bramsonplutzik.com; Jennifer Rosenberg; Demetrius X. Lambrinos; ncihlar@strauss-boies.com

Subject: CRT/Investigator to find former employees

Lauren

Lauren C. Capurro (Russell)

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EXHIBIT 20

John Bogdanov

From: Lauren Capurro (Russell) <LaurenRussell@tatp.com>
Sent: Wednesday, November 06, 2013 10:09 AM
To: John Bogdanov; 'Veronica Besmer'
Cc: 'Brian S. Umpierre'
Subject: RE: CRT/Philips memos

Attachments: [REDACTED]

Follow Up Flag: Follow up
Flag Status: Completed

Hi John, thanks for your detailed response. [REDACTED]

[REDACTED]

[REDACTED]

Lauren C. Capurro (Russell)
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E-mail: lauren russell@tatp.com

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From: John Bogdanov [mailto:jdb@coopkirk.com]
Sent: Tuesday, November 05, 2013 4:59 PM
To: Lauren Capurro (Russell); Veronica Besmer
Cc: Brian S. Umpierre
Subject: RE: CRT/Philips memos

Lauren,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Thanks,
John

John D. Bogdanov
COOPER & KIRKHAM, P.C.
357 Tehama Street, Second Floor
San Francisco, CA 94103
Telephone: 415-788-3030, Ext. 307
Facsimile: 415-882-7040
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From: Lauren Capurro (Russell) [<mailto:LaurenRussell@tntp.com>]
Sent: Tuesday, November 05, 2013 2:57 PM
To: John Bogdanov; Veronica Besmer
Cc: Brian S. Umpierre
Subject: CRT/Philips memos

Hi John & Brian,

[REDACTED]

[REDACTED]

[REDACTED]

Lauren

Lauren C. Capurro (Russell)
Attorney at Law
Trump, Alioto, Trump & Prescott, LLP
2280 Union Street
San Francisco, CA 94123
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E-mail: laurenrussell@tntp.com

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EXHIBIT 21

John Bogdanov

From: Lauren Capurro (Russell) <LaurenRussell@tatp.com>
Sent: Wednesday, November 13, 2013 4:43 PM
To: John Bogdanov
Cc: 'Diane Pritchard'
Subject: RE: CRTs - Deposition Notices for Leo Mink and Kris Mortier

Follow Up Flag: Follow up
Flag Status: Completed

Thanks, John. I really appreciate the quick turnaround. It sounds like we would want to depose Mortier. [REDACTED]

[REDACTED]

Lauren C. Capurro (Russell)
Attorney at Law
Trump, Alioto, Trump & Prescott, LLP
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San Francisco, CA 94123
Tel: (415) 563-7200
Direct line: (415) 447-1496
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E-mail: lauren russell@tatp.com

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From: John Bogdanov [mailto:jdb@coopkirk.com]
Sent: Wednesday, November 13, 2013 4:26 PM
To: Lauren Capurro (Russell)
Cc: Diane Pritchard
Subject: RE: CRTs - Deposition Notices for Leo Mink and Kris Mortier

[REDACTED]

[REDACTED]

[REDACTED]

[illegible]

[REDACTED]

John

John D. Bogdanov
COOPER & KIRKHAM, P.C.
357 Tehama Street, Second Floor
San Francisco, CA 94103
Telephone: 415-788-3030, Ext. 307
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From: Lauren Capurro (Russell) [<mailto:LaurenRussell@tntp.com>]
Sent: Wednesday, November 13, 2013 3:46 PM
To: John Bogdanov
Cc: Diane Pritchard
Subject: FW: CRTs - Deposition Notices for Leo Mink and Kris Mortier

Hi John – what do we have on Mortier? Is he worth deposing? Thanks.

Lauren C. Capurro (Russell)
Attorney at Law
Trump, Alioto, Trump & Prescott, LLP
2280 Union Street
San Francisco, CA 94123
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Direct line: (415) 447-1496
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E-mail: lauren russell@tntp.com

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From: Pamela Pham [<mailto:Pamela.Pham@doj.ca.gov>]

Sent: Wednesday, November 13, 2013 3:14 PM

To: Lauren Capurro (Russell); 'Casselman, Jill S.'; 'Kent, Matthew'; 'Bernstein, Debra'; 'Anne Nardacci'; 'Heaven, Astor'

Cc: rick@saveri.com; Emilio Varanini; Nicole Gordon; malioto@tstp.com; 'Diane Pritchard'; 'John Bogdanov'

Subject: RE: CRTs - Deposition Notices for Leo Mink and Kris Mortier

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Pamela Pham
Deputy Attorney General
State of California Department of Justice
Office of the Attorney General
455 Golden Gate Avenue, 11th Floor
San Francisco, California 94102
Telephone: (415) 703-5607
Email: Pamela.Pham@doj.ca.gov

From: Emilio Varanini

Sent: Wednesday, October 23, 2013 2:00 PM

To: Lauren Capurro (Russell); Pamela Pham; 'Casselman, Jill S.'; 'Kent, Matthew'; 'Bernstein, Debra'; 'Anne Nardacci'; 'Heaven, Astor'; rick@saveri.com

Cc: malioto@tstp.com; 'Diane Pritchard'; 'John Bogdanov'; Nicole Gordon

Subject: RE: CRTs - Deposition Notices for Leo Mink and Kris Mortier

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: Lauren Capurro (Russell) [LaurenRussell@tatp.com]

Sent: Tuesday, October 22, 2013 5:10 PM

To: Pamela Pham; Emilio Varanini; 'Casselman, Jill S.'; 'Kent, Matthew'; 'Bernstein, Debra'; 'Anne Nardacci'; 'Heaven, Astor'; rick@saveri.com

Cc: malioto@tatp.com; 'Diane Pritchard'; 'John Bogdanov'; Nicole Gordon

Subject: RE: CRTs - Deposition Notices for Leo Mink and Kris Mortier

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Lauren C. Capurro (Russell)

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E-mail: lauren russell@tatp.com

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From: Pamela Pham [<mailto:Pamela.Pham@doj.ca.gov>]

Sent: Tuesday, October 22, 2013 1:25 PM

To: Emilio Varanini; Lauren Capurro (Russell); Casselman, Jill S.; Kent, Matthew; Bernstein, Debra; Anne Nardacci; Heaven, Astor; rick@saveri.com

Cc: malioto@tntp.com; Diane Pritchard; 'John Bogdanov'; Nicole Gordon

Subject: RE: CRTs - Deposition Notices for Leo Mink and Kris Mortier

[REDACTED]

[REDACTED]

[REDACTED]

From: Pamela Pham

Sent: Friday, October 18, 2013 2:02 PM

To: Emilio Varanini; Lauren Capurro (Russell); Casselman, Jill S.; Kent, Matthew; Bernstein, Debra; Anne Nardacci; Heaven, Astor; rick@saveri.com

Cc: malioto@tntp.com; Diane Pritchard; 'John Bogdanov'; Nicole Gordon

Subject: CRTs - Deposition Notices for Leo Mink and Kris Mortier

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Pamela Pham
Deputy Attorney General
State of California Department of Justice
Office of the Attorney General
455 Golden Gate Avenue, 11th Floor
San Francisco, California 94102
Telephone: (415) 703-5607
Email: Pamela.Pham@doj.ca.gov

From: Emilio Varanini

Sent: Friday, October 18, 2013 12:04 PM

To: Lauren Capurro (Russell); Casselman, Jill S.; Kent, Matthew; Bernstein, Debra; Anne Nardacci; Heaven, Astor;
rick@saveri.com

Cc: malioto@tntp.com; Diane Pritchard; 'John Bogdanov'; Nicole Gordon; Pamela Pham

Subject: CRTs - Deposition of Jim Smith - Status and Proposed Conference Call

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: Lauren Capurro (Russell) [LaurenRussell@tntp.com]

Sent: Wednesday, October 09, 2013 3:23 PM

To: Casselman, Jill S.; Kent, Matthew; Bernstein, Debra; Anne Nardacci; Emilio Varanini; Heaven, Astor

Cc: malioto@tntp.com; Diane Pritchard; 'John Bogdanov'

Subject: CRT/Notice of Deposition of Wiebo Vaartjes

[REDACTED]

[REDACTED]

[REDACTED]

Lauren C. Capurro (Russell)

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EXHIBIT 22

John Bogdanov

From: Sylvie Kern <sylviekern@yahoo.com>
Sent: Tuesday, December 03, 2013 1:51 PM
To: John Bogdanov
Subject: Re: CRT-Philips Taiwan/Amazonia

Follow Up Flag: Follow up
Flag Status: Completed

Thanks, John, I will take a look.

Sylvie K. Kern
KAG Law Group
P.O. Box 210135
San Francisco, CA 94121
(415) 221-5763
www.antitrustglobal.com

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From: John Bogdanov <jdb@coopkirk.com>
To: "Sylvie Kern (sylviekern@yahoo.com)" <sylviekern@yahoo.com>
Sent: Tuesday, December 3, 2013 1:43 PM
Subject: RE: CRT-Philips Taiwan/Amazonia

Sylvie,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Thanks,
John

John D. Bogdanov
COOPER & KIRKHAM, P.C.
357 Tehama Street, Second Floor
San Francisco, CA 94103
Telephone: 415-788-3030, Ext. 307
Facsimile: 415-882-7040
email: jdb@coopkirk.com

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From: Sylvie Kern [<mailto:sylviekern@yahoo.com>]
Sent: Monday, December 02, 2013 4:56 PM
To: John Bogdanov
Subject: Re: CRT-Philips Taiwan/Amazonia

[REDACTED]

Sylvie K. Kern
KAG Law Group
P.O. Box 210135
San Francisco, CA 94121
(415) 221-5763
<http://www.antitrustglobal.com/>

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From: John Bogdanov <jdb@coopkirk.com>
To: Sylvie Kern <sylviekern@yahoo.com>
Sent: Monday, December 2, 2013 4:51 PM
Subject: RE: CRT-Philips Taiwan/Amazonia

Sylvie – The coast is clear at present, depending on anything else related to the Philips depos. How can I help?

John

From: Sylvie Kern [<mailto:sylviekern@yahoo.com>]
Sent: Monday, December 02, 2013 4:39 PM
To: John Bogdanov
Subject: CRT-Philips Taiwan/Amazonia

Hi John,

We need to find out what kinds of jurisdictional arguments these entities made in motions to dismiss in the DAP actions. Are you available? Fairly short fuse because of upcoming depositions.

Thanks,

Sylvie

Sylvie K. Kern
KAG Law Group
P.O. Box 210135
San Francisco, CA 94121
(415) 221-5763
<http://www.antitrustglobal.com/>

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EXHIBIT 23

John Bogdanov

From: Lauren Capurro (Russell) <LaurenRussell@tatp.com>
Sent: Monday, December 23, 2013 1:45 PM
To: Brian S. Umpierre; John Bogdanov; Veronica Besmer; ncihlar@strauss-boies.com; Bob Gralowski; Ike Diel; dbirkhaeuser@bramsonplutzik.com; Jennifer Rosenberg; Jennie Lee Anderson; Sylvie Kern; 'Judith Zahid'; 'Qianwei Fu'; Brian Cullen; Diane Pritchard
Subject: CRT/Liability memos
Attachments: CRT Evidence Summary Template [final].docx; 2013-11-14 CRT Best Chunghwa Evidence Memo.docx; 2013-11-08 Summary of Hitachi Fact Discovery.DOCX; FW: Summary of Evidence to Date Against Panasonic/MTPD; (60712407)_(1)_PHILIPS Liability Evidence Summary Memo - DAP Group.DOCX; SDI Liability Evidence Summary.docx; Dell_CRT - Toshiba Evidence Module_1.DOC; (60713816)_(1)_LG Liability Evidence Summary Memo - DAP Group.DOCX; 20131101 Thomson Defendant Summary.docx; List of Issues in the Case docx--lcc redline.docx

Follow Up Flag: Follow up
Flag Status: Flagged

Hi Everyone,

[REDACTED]

[REDACTED]

I would like each of the defendant teams to work on the memo for your defendant(s) since you are the most familiar with the evidence. [REDACTED]

[REDACTED] While your T1 reviewers may be able to help a bit in gathering the evidence, the selection of the best evidence for the memo will really be a job for the team leaders. I realize that some of you have depositions coming up and may not have time to focus on this over the next few weeks. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Lauren

Lauren C. Capurro (Russell)
Attorney at Law
Trump, Alioto, Trump & Prescott, LLP
2280 Union Street
San Francisco, CA 94123
Tel: (415) 563-7200
Direct line: (415) 447-1496
Cell: (415) 860-5051
Fax: (415) 346-0679
E-mail: laurenrussell@tntp.com

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EXHIBIT 24

John Bogdanov

From: Sylvie Kern <sylviekern@yahoo.com>
Sent: Wednesday, February 26, 2014 10:09 AM
To: John Bogdanov
Subject: PH Brazil

Follow Up Flag: Follow up
Flag Status: Flagged

Hi John, do we have any documents showing Philips Brazil sold to Sharp Mexico? Sorry if I asked before but I don't see anything on this in my file. Thanks!

Sylvie K. Kern
KAG Law Group
P.O. Box 210135
San Francisco, CA 94121
(415) 221-5763
www.antitrustglobal.com

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EXHIBIT 25

John Bogdanov

From: Lauren Capurro (Russell) <LaurenRussell@tatp.com>
Sent: Monday, June 23, 2014 8:44 PM
To: Bob Gralewski; Sylvie Kern; John Bogdanov; Brian S. Umpierre
Cc: ncihlar@strauss-boies.com
Subject: CRT/In-Person review of documents as potential trial exhibits and for authentication, week of 7/7/14

Importance: High

Follow Up Flag: Follow up
Flag Status: Flagged

Hi Everyone,

As you're all aware, we are working on coming up with a list of potential trial exhibits that we will send to the defendants and request that they stipulate to their authenticity as business records. [REDACTED]

[REDACTED] We would like the IPP review team to be the six people on this email. [REDACTED]

[REDACTED]

Lauren

Lauren C. Capurro (Russell)
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EXHIBIT 26

John Bogdanov

From: Lauren Capurro (Russell) <LaurenRussell@tatp.com>
Sent: Monday, July 21, 2014 8:55 PM
To: 'Novak, Paul'; Wedgworth, Peggy; Tarnor, Nathaniel; Gregory Stamatopoulos
Cc: John Bogdanov; Brian S. Umpierre
Subject: CRT/Philips contention rogs
Attachments: PHILIPS BEST EVIDENCE SUMMARY 20140507.docx; Memo Withdrawal Philips FINAL 20140630.doc-lcc comments.doc; All filed briefs.zip; Order Denying Philips MTD for Lack of PJ.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

[REDACTED]

[REDACTED] John & Brian should be able to answer any questions you have. I am also very familiar with the Philips evidence and can help if John & Brian are unavailable – there are several Philips/LPD depositions over the next month or so that they are preparing for.

[REDACTED]

Best,

Lauren

Lauren C. Capurro (Russell)
Attorney at Law
Trump, Alioto, Trump & Prescott, LLP
2280 Union Street
San Francisco, CA 94123
Tel: (415) 563-7200
Direct line: (415) 447-1496
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E-mail: lauren russell@tatp.com

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EXHIBIT 27

John Bogdanov

From: Lauren Capurro (Russell) <LaurenRussell@tatp.com>
Sent: Thursday, July 31, 2014 3:25 PM
To: Jennie Lee Anderson; Sylvie Kern; Jennifer Rosenberg; dbirkhaeuser@bramsonplutzik.com; Natalie Kabasakalian; Shinae Kim-Helms; Bob Gralewski; Ike Diel; QFu@zelle.com; Brian Cullen; John Bogdanov; Brian S. Umpierre
Cc: ncihlar@strauss-boies.com; malioto@tatp.com
Subject: CRT/Urgent Request for List of Important Current & Former Employees
Attachments: CRT - Draft template RFAs on document authentication.docx-lcc comments.docx; CRT - Authenticity Stipulation (SDI) - Ex B.docx

Importance: High

Follow Up Flag: Follow up
Flag Status: Flagged

Hi Everyone,

I need your help to get the attached RFA's finalized and serve them on defendants tomorrow.

I'm sorry for the push but we must serve the RFA's tomorrow so that responses are due before the close of discovery. Thank you in advance for your assistance.

Best,

Lauren

Lauren C. Capurro (Russell)
Attorney at Law
Trump, Alioto, Trump & Prescott, LLP
2280 Union Street
San Francisco, CA 94123
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Direct line: (415) 447-1496
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Fax: (415) 346-0679
E-mail: lauren russell@tatp.com

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EXHIBIT 28

John Bogdanov

From: Lauren Capurro (Russell) <LaurenRussell@tatp.com>
Sent: Thursday, July 31, 2014 9:10 PM
To: 'Qianwei Fu'; 'Sylvie Kern'; ncihlar@strauss-boies.com; 'Bob Gralewski'; 'Ike Diel'; John Bogdanov; 'Brian S. Umpierre'
Subject: RE: CRT/Offensive discovery requests
Attachments: IPP 1st Set of Interrogatories to All Defendants.doc; IPP RFAs to Philips.doc

Follow Up Flag: Follow up
Flag Status: Flagged

Thanks to you all for stepping up. [REDACTED]

Brian & John: I already took a quick look at the RFA's and they appear to need some work. For example, I'm not sure why they've limited the RFA's to sales by PCEC. Philips sold tubes to many other finished product makers for sale in the U.S. I think these RFA's could really benefit from of your Philips' specific knowledge. [REDACTED]

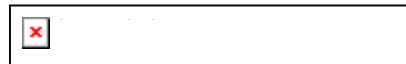
Lauren

Lauren C. Capurro (Russell)
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Tel: (415) 563-7200
Direct line: (415) 447-1496
Cell: (415) 860-5051
Fax: (415) 346-0679
E-mail: lauren russell@tatp.com

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From: Qianwei Fu [mailto:QFu@zelle.com]
Sent: Thursday, July 31, 2014 5:53 PM
To: Sylvie Kern; Lauren Capurro (Russell); ncihlar@strauss-boies.com; Bob Gralewski; Ike Diel; John D. Bogdanov; Brian S. Umpierre
Subject: RE: CRT/Offensive discovery requests

[REDACTED]



Qianwei Fu
Attorney at Law

[website](#) | [bio](#) | [vCard](#) | [map](#) | 

44 Montgomery Street, Suite 3400
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*In association with ZY & Partners

Please consider the environment before printing this email



From: Sylvie Kern [<mailto:sylviekern@yahoo.com>]

Sent: Thursday, July 31, 2014 5:05 PM

To: Lauren Capurro (Russell); Qianwei Fu; ncihlar@strauss-boies.com; Bob Gralewski; Ike Diel; John D. Bogdanov; Brian S. Umpierre

Subject: Re: CRT/Offensive discovery requests

Sylvie K. Kern
KAG Law Group
P.O. Box 210135
San Francisco, CA 94121
(415) 221-5763
www.antitrustglobal.com

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From: Lauren Capurro (Russell) <LaurenRussell@tatp.com>

To: 'Qianwei Fu' <QFu@zelle.com>; ncihlar@strauss-boies.com; Bob Gralewski <bgralewski@kmlp.com>; Ike Diel <idiel@sharpmcqueen.com>; John D. Bogdanov <jdb@coopkirk.com>; Sylvie Kern <sylviekern@yahoo.com>; Brian S. Umpierre <b.umpierre@gmail.com>

Sent: Thursday, July 31, 2014 4:39 PM

Subject: CRT/Offensive discovery requests

Hi guys,

So I have another fire drill project that I need your help with. Milberg is drafting offensive contention discovery requests (RFA's + rogs) to defendants that must be served by tomorrow. I could use some help reviewing them. are any of you available? thanks.

Lauren

Lauren C. Capurro (Russell)
Attorney at Law
Trump, Alioto, Trump & Prescott, LLP
2280 Union Street
San Francisco, CA 94123
Tel: (415) 563-7200
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E-mail: laurenrussell@tatp.com

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EXHIBIT 29

John Bogdanov

From: Lauren Capurro <LaurenRussell@tatp.com>
Sent: Monday, August 18, 2014 5:42 PM
To: b.umpierre@gmail.com; John Bogdanov; idiel@sharpmcqueen.com; bgralewski@kmlp.com; Shinae Kim-Helms; Jennie Anderson; Sylvie Kern; Qianwei Fu; bwc@classcounsel.com; Jennifer Rosenberg; Dan Birkhaeuser
Cc: Nathan Cihlar; Thomas Palumbo; Peggy Wedgworth
Subject: Fwd: CRT/Meeting grid and responses to contention discovery

Follow Up Flag: Follow up
Flag Status: Flagged

Having technical difficulties--sorry. Please see my message below. Thanks!

Lauren

Begin forwarded message:

From: "Lauren C. Capurro" <lauren russell@tatp.com>
Date: August 18, 2014 at 5:25:07 PM PDT
To: <lauren russell@tatp.com>
Subject: CRT/Meeting grid and responses to contention discovery

Hi Everyone:

[REDACTED] As you know, we are nearing the close of discovery (Sept 5) and I would like to have a call with you tomorrow, Tuesday, August 19, at 11 am Pacific, or anytime after 11 a.m. Pacific on Wednesday, to discuss a few items that we're going to need your help with over the next few weeks.

1. **Updating the conspiracy meeting grid for use in our responses to defendants' contention interrogatories:** this is the most urgent matter that I need your help with. [REDACTED]

2. **Defendants' responses to our contention discovery:** [REDACTED]

[REDACTED] We obviously need to be ready to move quickly. Given the very short time period we have to move, each defendant team leader will have to handle the meet and confers and any motion. [REDACTED]

3. **Meeting and conferring with defendants regarding our responses to their contention discovery:** [REDACTED]

[REDACTED] I'm hoping that each defendant team leader can handle any meet and confers with Milberg's assistance. [REDACTED]

4. **Responding to additional contention interrogatories from defendants:** Milberg is currently working on responses to contention interrogatories from Philips (due August 25), [REDACTED] Milberg will need your assistance to finalize these responses so please be ready.

[REDACTED]

Lauren

<CRT - Conspiracy Evidence - DAP IPP (41) (2).xlsx>

<IPP Master Grid_CRT Conspiracy Meetings - New Addition Template.xlsx>

EXHIBIT 30

John Bogdanov

From: Lauren Capurro (Russell) <LaurenRussell@tatp.com>
Sent: Tuesday, September 09, 2014 5:25 PM
To: John Bogdanov; 'Brian S. Umpierre'
Subject: RE: CRT - letter motions to compel

Follow Up Flag: Follow up
Flag Status: Flagged

Okay, thanks.

Lauren C. Capurro (Russell)
Attorney at Law
Trump, Alioto, Trump & Prescott, LLP
2280 Union Street
San Francisco, CA 94123
Tel: (415) 563-7200
Direct line: (415) 447-1496
Cell: (415) 860-5051
Fax: (415) 346-0679
E-mail: lauren russell@tatp.com

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From: John Bogdanov [<mailto:jdb@coopkirk.com>]
Sent: Tuesday, September 09, 2014 2:22 PM
To: Lauren Capurro (Russell); Brian S. Umpierre
Subject: RE: CRT - letter motions to compel

Lauren –

I just concluded the meet and confer with Philips. They are going to stand on their position not to respond to Interrogatory 7 purely on the super-numerosity argument. They agreed to supplement their responses and follow up with all of the other issues discussed during the initial meet and confer yesterday. I will be memorializing those issues for Chuck.

John

John D. Bogdanov
COOPER & KIRKHAM, P.C.
357 Tehama Street, Second Floor
San Francisco, CA 94103
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Facsimile: 415-882-7040
email: jdb@coopkirk.com

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□ □ □ □ □

[REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]

2

this communication in error, please erase all copies of the message and its attachments and notify sender immediately.
Thank You.

EXHIBIT 31

John Bogdanov

From: charles.malaise@bakerbotts.com
Sent: Friday, September 12, 2014 7:27 AM
To: John Bogdanov
Cc: erik.koons@bakerbotts.com; dpritchard@vmbllp.com; LaurenRussell@tatp.com; b.umpierre@gmail.com; pwedgworth@milberg.com; pnovak@milberg.com
Subject: RE: CRT - Meet and Confer Requested

Follow Up Flag: Follow up
Flag Status: Flagged

John,

Sorry for the delay, but I have reviewed your letter and believe it accurately reflects our recent meet and confers. I will begin the process of providing you the information or supplementations detailed in your letter.

Let me know if there are any other issues you would like to discuss.

Regards,

Charles Malaise
Senior Associate | **Baker Botts L.L.P.**
1299 Pennsylvania Avenue, N.W.
Washington, DC 20004-2400
202.639.1117 (direct)
202.585.1037 (fax)
charles.malaise@bakerbotts.com

From: John Bogdanov [mailto:jdb@coopkirk.com]
Sent: Wednesday, September 10, 2014 2:45 PM
To: Malaise, Charles
Cc: Koons, Erik; dpritchard@vmbllp.com; LaurenRussell@tatp.com; Brian S. Umpierre; pwedgworth@milberg.com; pnovak@milberg.com
Subject: RE: CRT - Meet and Confer Requested

Chuck,

Please see attached letter following up our recent meet and confers.

Thanks,
John

John D. Bogdanov
COOPER & KIRKHAM, P.C.
357 Tehama Street, Second Floor
San Francisco, CA 94103
Telephone: 415-788-3030, Ext. 307
Facsimile: 415-882-7040
email: jdb@coopkirk.com

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From: charles.malaise@bakerbotts.com [<mailto:charles.malaise@bakerbotts.com>]
Sent: Tuesday, September 09, 2014 8:20 AM
To: John Bogdanov
Cc: erik.koons@bakerbotts.com; dpritchard@vmbllp.com; LaurenRussell@tatp.com; pwedgworth@milberg.com; pnovak@milberg.com
Subject: RE: CRT - Meet and Confer Requested

John,

Can we move our call today to 5:00 pm eastern / 2:00 pacific? I have a conflict at 4:00 that I can't get out of.

Thanks

Charles Malaise
Senior Associate | **Baker Botts L.L.P.**
1299 Pennsylvania Avenue, N.W.
Washington, DC 20004-2400
202.639.1117 (direct)
202.585.1037 (fax)
charles.malaise@bakerbotts.com

From: John Bogdanov [<mailto:jdb@coopkirk.com>]
Sent: Monday, September 08, 2014 8:51 AM
To: Malaise, Charles
Cc: Koons, Erik; dpritchard@vmbllp.com; LaurenRussell@tatp.com; 'Wedgworth, Peggy'; 'Novak, Paul'
Subject: Re: CRT - Meet and Confer Requested

Chuck,

Please see attached letter.

Thanks,
John

John D. Bogdanov

COOPER & KIRKHAM, P.C.

357 Tehama Street, Second Floor

San Francisco, CA 94103

Telephone: 415-788-3030, Ext. 307

Facsimile: 415-882-7040

email: jdb@coopkirk.com

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From: John Bogdanov <jdb@coopkirk.com>
Date: Friday, September 5, 2014 at 4:59 PM
To: "charles.malaise@bakerbotts.com" <charles.malaise@bakerbotts.com>
Cc: "erik.koons@bakerbotts.com" <erik.koons@bakerbotts.com>, Diane Pritchard <dpritchard@vmbllp.com>, "lauren russell@tatp.com" <lauren russell@tatp.com>, "Wedgworth, Peggy" <pwedgworth@milberg.com>, "Novak, Paul" <pnovak@milberg.com>
Subject: RE: CRT - Meet and Confer Requested

Chuck,

We can be available at 9:00 a.m. Pacific/Noon Eastern. Please use the following call-in information:

Number: 866-212-0875
Code: 500089#

Thanks,
John

John D. Bogdanov
COOPER & KIRKHAM, P.C.
357 Tehama Street, Second Floor
San Francisco, CA 94103
Telephone: 415-788-3030, Ext. 307
Facsimile: 415-882-7040
email: jdb@coopkirk.com

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From: charles.malaise@bakerbotts.com [<mailto:charles.malaise@bakerbotts.com>]
Sent: Friday, September 05, 2014 1:14 PM
To: John Bogdanov
Cc: erik.koons@bakerbotts.com; b.umpierre@gmail.com; dpritchard@vmbllp.com; LaurenRussell@tatp.com
Subject: RE: CRT - Meet and Confer Requested

John,

On Monday, I have conflicts already at the following times (eastern):

- 2:00 – 3:30 pm
- 4:30 – 5:00 pm
- 5:15 – 7:30 pm

Feel free to pick a time that works for your schedule.

Regards,

Charles Malaise

Senior Associate | **Baker Botts L.L.P.**

1299 Pennsylvania Avenue, N.W.

Washington, DC 20004-2400

202.639.1117 (direct)

202.585.1037 (fax)

charles.malaise@bakerbotts.com

From: John Bogdanov [<mailto:jdb@coopkirk.com>]

Sent: Friday, September 05, 2014 3:52 PM

To: Malaise, Charles

Cc: Koons, Erik; Brian S. Umpierre (b.umpierre@gmail.com); Diane Pritchard; Lauren Capurro (Russell)

Subject: CRT - Meet and Confer Requested

Chuck,

Please let us know when Philips is available on Monday, September 8, 2014, for a meet and confer regarding the responses of Philips (KPNV, PENAC, Philips Brazil and Philips Taiwan) to Indirect Purchaser Plaintiffs' First Sets of Interrogatories and Requests for Admission, and Philips' responses to Indirect Purchaser Plaintiffs' and Direct Action Plaintiffs' Third Set of Requests for Production of Documents.

Thanks,
John

John D. Bogdanov

COOPER & KIRKHAM, P.C.

357 Tehama Street, Second Floor

San Francisco, CA 94103

Telephone: 415-788-3030, Ext. 307

Facsimile: 415-882-7040

email: jdb@coopkirk.com

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EXHIBIT 32

John Bogdanov

From: Sylvie Kern <sylviekern@yahoo.com>
Sent: Wednesday, October 15, 2014 4:21 PM
To: John Bogdanov
Subject: Re: Fwd: Add'l FTAIA evidence

Follow Up Flag: Follow up
Flag Status: Completed


OK. Thanks.

Sylvie K. Kern
KAG Law Group
P.O. Box 210135
San Francisco, CA 94121
(415) 221-5763
www.antitrustglobal.com

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From: John Bogdanov <jdb@coopkirk.com>
To: Sylvie Kern <sylviekern@yahoo.com>
Sent: Wednesday, October 15, 2014 9:07 AM
Subject: RE: Fwd: Add'l FTAIA evidence

Sylvie –



John

From: Sylvie Kern [mailto:sylviekern@yahoo.com]
Sent: Tuesday, October 14, 2014 3:21 PM
To: John Bogdanov
Subject: Re: Fwd: Add'l FTAIA evidence



Sylvie K. Kern
KAG Law Group
P.O. Box 210135
San Francisco, CA 94121
(415) 221-5763
www.antitrustglobal.com

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From: John Bogdanov <jdb@coopkirk.com>
To: Sylvie Kern <sylviekern@yahoo.com>
Sent: Friday, October 3, 2014 9:27 AM
Subject: RE: Fwd: Add'l FTAIA evidence

Sylvie –



Thanks,
John

From: Sylvie Kern [<mailto:sylviekern@yahoo.com>]
Sent: Thursday, October 02, 2014 10:34 AM
To: John Bogdanov
Subject: Fw: Fwd: Add'l FTAIA evidence



Thanks!

Sylvie K. Kern
KAG Law Group
P.O. Box 210135
San Francisco, CA 94121
(415) 221-5763
www.antitrustglobal.com

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----- Forwarded Message -----

From: Veronica Besmer <veronica@besmerlaw.com>
To: Sylvie Kern <sylviekern@yahoo.com>
Sent: Wednesday, September 3, 2014 1:22 PM
Subject: Re: Fwd: Add'l FTAIA evidence

John was at every Philips depo, I believe (and definitely was instrumental in preparing for each of them), so he is in a much better position than me pointing out good depositions for you. [REDACTED]

On Wed, Sep 3, 2014 at 1:18 PM, Sylvie Kern <sylviekern@yahoo.com> wrote:

Thanks, I will do that. Any other depositions you know of?

Sylvie K. Kern
KAG Law Group
P.O. Box 210135
San Francisco, CA 94121
(415) 221-5763
www.antitrustglobal.com

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From: Veronica Besmer <veronica@besmerlaw.com>
To: Sylvie Kern <sylviekern@yahoo.com>
Cc: John Bogdanov <jdb@coopkirk.com>
Sent: Wednesday, September 3, 2014 1:13 PM
Subject: Fwd: Add'l FTAIA evidence

Sylvie,

As mentioned in my email below, I keep getting weekly emails from the Philips doc review team, which John Bogdanov is heading up (CC'd here). [REDACTED]

In addition, John Bogdanov today spoke about the various good testimony we got from [REDACTED]

[REDACTED] I think it might be worthwhile for the two of you to connect so John can give you a brief update. [REDACTED]

[REDACTED]

Veronica

----- Forwarded message -----

From: **Veronica Besmer** <veronica@besmerlaw.com>

Date: Wed, Jun 25, 2014 at 1:06 PM

Subject: Add'l FTAIA evidence

To: Sylvie Kern <sylviekern@yahoo.com>

Cc: Lauren Russell Capurro <lauren russell@tatp.com>

Sylvie,

[REDACTED]

Best,
Veronica

--

Veronica Besmer
Attorney at Law
ph: 415.441.1775
veronica@besmerlaw.com
www.besmerlaw.com

--

Veronica Besmer
Attorney at Law
veronica@besmerlaw.com
www.besmerlaw.com

EXHIBIT 33

John Bogdanov

From: Lauren Capurro (Russell) <LaurenRussell@tatp.com>
Sent: Friday, October 17, 2014 2:08 PM
To: Sylvie Kern; Jennie Lee Anderson; dbirkhaeuser@bramsonplutzik.com; Jennifer Rosenberg; Natalie Kabasakalian; ncihlar@straus-boies.com; Bob Gralewski; Ike Diel; John Bogdanov; Brian S. Umpierre; Diane Pritchard; 'Qianwei Fu'; Brian Cullen; 'Judith Zahid'; Robert Newman
Cc: sisselbrowder@yahoo.com; malioto@tatp.com; Navarro, Victor; Richard Noh; Thomas Palumbo
Subject: RE: CRT/Deposition designations and liability memos
Attachments: IPP Deposition Designation Protocol [final].docx

Follow Up Flag: Follow up
Flag Status: Flagged

Hi Everyone,

[REDACTED]

[REDACTED]

[REDACTED]

Schedule for completion:

1. We've agreed with the DAPs to complete the current assignments and exchange transcripts no later than **Monday, November 3** (I realize this is slightly earlier than we discussed on Wednesday).

[REDACTED]

[REDACTED]

[REDACTED] in.

[REDACTED]

Finally, we also need to pare down the list of trial exhibits by December 5. This will be done, in part, through the deposition designation process, i.e. if you designate testimony regarding a particular exhibit, that exhibit will definitely be on the trial exhibit list that we give to defendants. [REDACTED]

[REDACTED]

Okay guys, this is really crunch time. We all need to step up the plate here since time is clearly very tight and all of the work I just described in November will be going on at the same time as we're preparing our oppositions to summary judgment. Let's get as much as we can done in the next three weeks before the summary judgment motions come in so we can fully focus on those. Thanks!

Have a good weekend

Lauren

Lauren C. Capurro (Russell)
Attorney at Law
Trump, Alioto, Trump & Prescott, LLP
2280 Union Street
San Francisco, CA 94123
Tel: (415) 563-7200
Direct line: (415) 447-1496
Cell: (415) 860-5051
Fax: (415) 346-0679
E-mail: lauren russell@tatp.com

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From: Lauren Capurro (Russell) [mailto:LaurenRussell@tatp.com]
Sent: Tuesday, October 14, 2014 3:26 PM
To: Sylvie Kern (sylviekern@yahoo.com); Jennie Lee Anderson; dbirkhaeuser@bramsonplutzik.com; Jennifer Rosenberg; Natalie Kabasakalian; ncihlar@strauss-boies.com; Bob Gralewski; Ike Diel; John D. Bogdanov; Brian S. Umpierre; Diane Pritchard; 'Qianwei Fu'; Brian Cullen (bwc@classcounsel.com)
Cc: sisselbrowder@yahoo.com; malieto@tatp.com; Navarro, Victor (vnavarro@milberg.com)
Subject: RE: CRT/Deposition designations and liability memos
Importance: High

Hi Everyone,

[REDACTED]

[REDACTED]

Thank you.

Lauren

Lauren C. Capurro (Russell)
Attorney at Law
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2280 Union Street
San Francisco, CA 94123
Tel: (415) 563-7200
Direct line: (415) 447-1496
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Fax: (415) 346-0679
E-mail: lauren russell@tatp.com

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From: Lauren Capurro (Russell) [mailto:LaurenRussell@tatp.com]

Sent: Wednesday, October 08, 2014 5:06 PM

To: Sylvie Kern (sylviekern@yahoo.com); Jennie Lee Anderson; dbirkhaeuser@bramsonplutzik.com; Jennifer Rosenberg; Natalie Kabasakalian; ncihlar@strauss-boies.com; Bob Gralewski; Ike Diel; John D. Bogdanov; Brian S. Umpierre; Diane Pritchard; 'Qianwei Fu'; Brian Cullen (bwc@classcounsel.com)

Cc: sisselbrowder@yahoo.com; malioto@tatp.com

Subject: RE: CRT/Deposition designations and liability memos

Hi Everyone,

[REDACTED]

[REDACTED]

[REDACTED]

Lauren

Lauren C. Capurro (Russell)
Attorney at Law
Trump, Alioto, Trump & Prescott, LLP
2280 Union Street
San Francisco, CA 94123
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E-mail: lauren russell@tntp.com

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From: Lauren Capurro (Russell) [<mailto:LaurenRussell@tntp.com>]
Sent: Tuesday, September 30, 2014 3:28 PM
To: Sylvie Kern (sylviekern@yahoo.com); Jennie Lee Anderson; dbirkhaeuser@bramsonplutzik.com; Jennifer Rosenberg; Natalie Kabasakalian; ncihlar@strauss-boies.com; Bob Gralewski; Ike Diel; John D. Bogdanov; Brian S. Umpierre; Diane Pritchard; 'Qianwei Fu'; Brian Cullen (bwc@classcounsel.com); Diane Pritchard
Cc: sisselbrowder@yahoo.com; malioto@tntp.com
Subject: CRT/Deposition designations and liability memos
Importance: High

Hi Everyone,

[REDACTED]

[REDACTED]

[REDACTED]



Best regards,

Lauren

Lauren C. Capurro (Russell)
Attorney at Law
Trump, Alioto, Trump & Prescott, LLP
2280 Union Street
San Francisco, CA 94123
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Direct line: (415) 447-1496
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E-mail: laurenrussell@tntp.com

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EXHIBIT 34

John Bogdanov

From: Lauren Capurro (Russell) <LaurenRussell@tatp.com>
Sent: Thursday, November 06, 2014 1:01 PM
To: Jennifer Rosenberg; dbirkhaeuser@bramsonplutzik.com; Natalie Kabasakalian; Jennie Lee Anderson; Sylvie Kern; John Bogdanov; Diane Pritchard; Brian S. Umpierre; Bob Gralewski; ncihlar@strauss-boies.com; Ike Diel; 'Qianwei Fu'; 'Judith Zahid'; Brian Cullen
Cc: sisselbrowder@yahoo.com; Navarro, Victor
Subject: CRT/Deposition designations

Follow Up Flag: Follow up
Flag Status: Flagged

Hi Everyone,

Great job on pushing through on the deposition designations and getting them done by the deadline! I really appreciate everyone's hard work.

Best,

Lauren

Lauren C. Capurro (Russell)
Attorney at Law
Trump, Alioto, Trump & Prescott, LLP
2280 Union Street
San Francisco, CA 94123
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E-mail: lauren russell@t atp.com

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EXHIBIT 35

John Bogdanov

From: Lauren Capurro (Russell) <LaurenRussell@tatp.com>
Sent: Tuesday, November 11, 2014 2:35 PM
To: John Bogdanov
Cc: Diane Pritchard; Brian S. Umpierre
Subject: RE: CRT/Summary Judgment Motions
Attachments: IPP Opp to MTD Excerpt re Withdrawal.pdf; CRT - Philips Subs MSJ Memo re argument assessment - 11-11-14.doc-lcc comments.doc

Follow Up Flag: Follow up
Flag Status: Flagged

Hi John, here are some comments. I like your suggestion of responding to both Philips motions together. [REDACTED]

[REDACTED]

[REDACTED] We really have to get away from the separate Philips legal entities because as you and Brian both pointed out, it allows them to frame the issues and limit/compartmentalize the evidence to suit them.

[REDACTED]

Lauren

Lauren C. Capurro (Russell)
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San Francisco, CA 94123
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Fax: (415) 346-0679
E-mail: lauren russell@tatp.com

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From: John Bogdanov [<mailto:jdb@coopkirk.com>]
Sent: Tuesday, November 11, 2014 11:17 AM
To: Lauren Capurro (Russell)
Cc: Diane Pritchard; Brian S. Umpierre (b.umpierre@gmail.com)
Subject: RE: CRT/Summary Judgment Motions

Lauren –

Here is the memo regarding the Philips' subsidiaries partial motion for summary judgment re withdrawal (Dock. 3027).

Thanks,
John

From: Lauren Capurro (Russell) [<mailto:LaurenRussell@tntp.com>]

Sent: Saturday, November 08, 2014 10:49 PM

To: Jennifer Rosenberg; dbirkhaeuser@bramsonplutzik.com; Jennie Lee Anderson; Sylvie Kern; Natalie Kabasakalian; Veronica Besmer; John Bogdanov; Brian S. Umpierre; Diane Pritchard; 'Judith Zahid'; 'Qianwei Fu'; Brian Cullen; ncihlar@strauss-boies.com; Thomas Palumbo; Bob Gralewski

Cc: sisselbrowder@yahoo.com; malieto@tntp.com

Subject: CRT/Summary Judgment Motions

Importance: High

Hi Everyone,

Here is a list of all of the summary judgment motions, including which plaintiff(s) the motions are directed at. I have included a short summary of each motion directed at us (the first 12) and a column indicating which motions I would like you all to work on. By Tuesday morning, I would like you to prepare a short simple memo laying out (in bullet form, for example) the arguments and your assessment of them, particularly the most troubling ones. [REDACTED]

Best,

Lauren

Lauren C. Capurro (Russell)
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Tel: (415) 563-7200
Direct line: (415) 447-1496
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EXHIBIT 36

John Bogdanov

From: Lauren Capurro (Russell) <LaurenRussell@tatp.com>
Sent: Friday, November 21, 2014 12:49 PM
To: ncihlar@strauss-boies.com; Bob Gralewski; Ike Diel; Jennie Lee Anderson; Sylvie Kern; 'Qianwei Fu'; Brian Cullen; Veronica Besmer; Brian S. Umpierre; John Bogdanov; Diane Pritchard; 'Novak, Paul'; Gregory Stamatopoulos; Elizabeth Brehm; William Harris; Shinae Kim-Helms; Thomas Palumbo
Cc: dbirkhaeuser@bramsonplutzik.com; Jennifer Rosenberg; Natalie Kabasakalian; sisselbrowder@yahoo.com
Subject: CRT/Awesome Discovery Orders
Attachments: 2014 11 20 Order Plaintiffs' Motion to Compel Depositions of Toshiba Witness.pdf; 2014 11 12 Order IPPs v Samsung SDI - Motion to Strike Two Errata.pdf; 2014 11 18 Order IPP'S Motion to Compel Deposition of Samsung SDI'S Employee, MR JS AHN.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Hi Everyone,

[REDACTED]

[REDACTED]

Finally, I want to take this opportunity to say how much I appreciate all of the hard work you're all putting into this case right now. You're all doing an awesome job! Everyone has stepped up and we're on track to get everything that needs done, done. And the oppositions to the summary judgment motions are shaping up nicely. Thank you.

Happy Friday and have a good weekend!

Lauren

Lauren C. Capurro (Russell)
Attorney at Law
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2280 Union Street
San Francisco, CA 94123
Tel: (415) 563-7200
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EXHIBIT 37

John Bogdanov

From: Lauren Capurro (Russell) <LaurenRussell@tatp.com>
Sent: Monday, December 01, 2014 9:13 AM
To: John Bogdanov
Cc: 'Brian S. Umpierre'; 'Diane Pritchard'; lauren russell@tatp.com
Subject: RE: CRT Deposition Designations

Follow Up Flag: Follow up
Flag Status: Flagged

Thanks, John! FYI: I've been reviewing some of their proposed changes to the Chunghwa depositions & disagreed with quite a few of their proposed deletions.

For example, they proposed to delete testimony from [REDACTED]

[REDACTED] This obviously shows a lack of knowledge re the facts in this case. So don't hesitate to speak up if you disagree with their proposed changes. It's no doubt very helpful to have them review the designations & make sure there's nothing problematic & that we didn't miss something, but we know more about the facts here. Thanks!

-----Original Message-----

From: John Bogdanov [<mailto:jdb@coopkirk.com>]
Sent: Monday, December 01, 2014 8:44 AM
To: Lauren Capurro (Russell)
Cc: Brian S. Umpierre; Diane Pritchard
Subject: RE: CRT Deposition Designations

Will do.

-----Original Message-----

From: Lauren Capurro (Russell) [<mailto:LaurenRussell@tatp.com>]
Sent: Saturday, November 29, 2014 4:34 PM
To: John Bogdanov
Cc: Brian S. Umpierre; Diane Pritchard; lauren russell@tatp.com
Subject: FW: CRT Deposition Designations

Here's some proposed changes for Joe Killen. Can you please look at these too? Thanks.

-----Original Message-----

From: Gerard Dever [<mailto:gdever@finekaplan.com>]
Sent: Wednesday, November 26, 2014 3:01 PM
To: lauren russell@tatp.com
Cc: Elise Singer; deperelman@finekaplan.com; Allyson Katzman
Subject: FW: CRT Deposition Designations

Lauren:

I have attached the memo for the Joseph Killen designations prepared by Elise Singer of Fine Kaplan. Please send along to the original reviewer so we can get some feedback on the suggested revisions when you get a chance.

Happy Thanksgiving!

Jerry

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EXHIBIT 38

John Bogdanov

From: Lauren Capurro (Russell) <LaurenRussell@tatp.com>
Sent: Monday, December 01, 2014 5:17 PM
To: Brian S. Umpierre; John Bogdanov
Cc: sisselbrowder@yahoo.com
Subject: CRT/Philips docs with no ranking in trial exhibit list
Attachments: CRT Master Trial Exhibit List - WORKING DRAFT - 12 1 14 (4) - Unranked docs only (2).xlsx

Follow Up Flag: Follow Up
Flag Status: Flagged

Hi Brian & John,

I know that you guys are both looking at the exhibits from recent Philips depositions to ascertain which ones should remain on the trial exhibit list. [REDACTED]

Lauren

Lauren C. Capurro (Russell)
Attorney at Law
Trump, Alioto, Trump & Prescott, LLP
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San Francisco, CA 94123
Tel: (415) 563-7200
Direct line: (415) 447-1496
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E-mail: lauren russell@tatp.com

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EXHIBIT 39

John Bogdanov

From: Lauren Capurro (Russell) <LaurenRussell@tatp.com>
Sent: Thursday, December 04, 2014 4:34 AM
To: 'Rottner, Jason'; 'Diane Pritchard'; John Bogdanov; 'Brian S. Umpierre'
Cc: 'Houser, Donald'; 'Kent, Matthew'; lauren russell@tatp.com
Subject: RE: Dell/Philips Evidence
Attachments: Statement of Facts -- current.DOC

Follow Up Flag: Follow up
Flag Status: Flagged

Hi Jason,

[REDACTED] I've attached the current version of the statement of facts that Diane & Brian have put together. Brian & John are still adding some of the evidence citations to Sections II & III, however. I'm sorry this is a bit later than we originally agreed but I've needed Brian and John to help me finalize our trial exhibit list and depo designations, which are due to defendants tomorrow. [REDACTED]

[REDACTED] I need Brian and John today and tomorrow to continue helping me on the trial exhibit list and depo designations, so we'd very much appreciate it if you could take the lead on this. I hope this is okay. Thanks.

Lauren

From: Rottner, Jason [mailto:Jason.Rottner@alston.com]
Sent: Wednesday, December 03, 2014 3:26 PM
To: Lauren Capurro (Russell); 'Diane Pritchard'; 'John Bogdanov'; 'Brian S. Umpierre'
Cc: Houser, Donald; Kent, Matthew
Subject: RE: Dell/Philips Evidence

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: Lauren Capurro (Russell) [<mailto:LaurenRussell@tatp.com>]
Sent: Tuesday, November 25, 2014 6:03 PM
To: Rottner, Jason; 'Diane Pritchard'; 'John Bogdanov'; 'Brian S. Umpierre'; Kent, Matthew
Cc: Houser, Donald
Subject: RE: Dell/Philips Evidence

[REDACTED]

Lauren C. Capurro (Russell)
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E-mail: lauren russell@tatp.com

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From: Rottner, Jason [<mailto:Jason.Rottner@alston.com>]
Sent: Tuesday, November 25, 2014 3:01 PM
To: Diane Pritchard; 'John Bogdanov'; 'Brian S. Umpierre'; Kent, Matthew
Cc: 'Lauren Capurro (Russell)'; Houser, Donald
Subject: RE: Dell/Philips Evidence

[REDACTED]

From: Diane Pritchard [<mailto:dpritchard@vmbllp.com>]
Sent: Tuesday, November 25, 2014 5:57 PM
To: Rottner, Jason; 'John Bogdanov'; 'Brian S. Umpierre'; Kent, Matthew
Cc: 'Lauren Capurro (Russell)'; Houser, Donald
Subject: RE: Dell/Philips Evidence

[REDACTED]

[REDACTED]



VOGL MEREDITH BURKE LLP
ATTORNEYS AT LAW

Diane Pritchard
VOGL MEREDITH BURKE LLP
456 Montgomery Street, 20th Floor
San Francisco, CA 94104
(415) 398-0200
(415) 398-2820 Facsimile
www.vmbllp.com

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From: Rottner, Jason [<mailto:Jason.Rottner@alston.com>]
Sent: Tuesday, November 25, 2014 2:41 PM
To: John Bogdanov; Brian S. Umpierre; Kent, Matthew
Cc: Lauren Capurro (Russell); Houser, Donald; Diane Pritchard
Subject: RE: Dell/Philips Evidence

[REDACTED]

[REDACTED]

[REDACTED]

Jason

From: John Bogdanov [<mailto:jdb@coopkirk.com>]
Sent: Tuesday, November 25, 2014 4:50 PM
To: Brian S. Umpierre; Kent, Matthew
Cc: Lauren Capurro (Russell); Rottner, Jason; Houser, Donald; Diane Pritchard
Subject: RE: Dell/Philips Evidence

[REDACTED]

From: Brian S. Umpierre [<mailto:b.umpierre@gmail.com>]
Sent: Tuesday, November 25, 2014 1:39 PM
To: Kent, Matthew
Cc: Lauren Capurro (Russell); Rottner, Jason; Houser, Donald; John Bogdanov; Diane Pritchard
Subject: Re: Dell/Philips Evidence

[REDACTED]

On Mon, Nov 24, 2014 at 4:05 PM, Kent, Matthew <Matthew.Kent@alston.com> wrote:

[REDACTED]

[REDACTED]

[REDACTED]

Matthew D. Kent

Senior Associate | Alston & Bird LLP

1201 W. Peachtree St. | Atlanta, Ga. 30309

[404.881.7948](tel:404.881.7948) – direct | [404.253.8128](tel:404.253.8128) – fax

matthew.kent@alston.com

From: Lauren Capurro (Russell) [mailto:LaurenRussell@tatp.com]

Sent: Monday, November 24, 2014 5:12 PM

To: Kent, Matthew; 'Brian S. Umpierre'; Rottner, Jason

Cc: Houser, Donald; 'John Bogdanov'; 'Diane Pritchard'

Subject: RE: Dell/Philips Evidence

[REDACTED]

Lauren C. Capurro (Russell)

Attorney at Law

Trump, Alioto, Trump & Prescott, LLP

2280 Union Street

San Francisco, CA 94123

Tel: [\(415\) 563-7200](tel:(415)563-7200)

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Fax: [\(415\) 346-0679](tel:4153460679)

E-mail: lauren russell@tatp.com

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From: Kent, Matthew [<mailto:Matthew.Kent@alston.com>]
Sent: Monday, November 24, 2014 2:03 PM
To: Lauren Capurro (Russell); 'Brian S. Umpierre'; Rottner, Jason
Cc: Houser, Donald; 'John Bogdanov'; 'Diane Pritchard'
Subject: RE: Dell/Philips Evidence

[REDACTED]

[REDACTED]

[REDACTED]

Matthew D. Kent
Senior Associate | Alston & Bird LLP
1201 W. Peachtree St. | Atlanta, Ga. 30309
[404.881.7948](tel:404.881.7948) – direct | [404.253.8128](tel:404.253.8128) – fax
matthew.kent@alston.com

From: Lauren Capurro (Russell) [<mailto:LaurenRussell@tatp.com>]
Sent: Saturday, November 22, 2014 12:14 PM
To: 'Brian S. Umpierre'; Rottner, Jason
Cc: Houser, Donald; Kent, Matthew; 'John Bogdanov'; 'Diane Pritchard'; lauren russell@tatp.com
Subject: RE: Dell/Philips Evidence

[REDACTED]

[REDACTED]

[REDACTED]

From: Brian S. Umpierre [<mailto:b.umpierre@gmail.com>]

Sent: Tuesday, November 18, 2014 3:23 PM

To: Jason Rottner

Cc: Houser, Donald; Lauren C. Russell; Kent, Matthew; John Bogdanov; Diane Pritchard (dpritchard@vmbllp.com)

Subject: RE: Dell/Philips Evidence

[REDACTED]

[REDACTED]

On Nov 18, 2014 2:21 PM, "Rottner, Jason" <Jason.Rottner@alston.com> wrote:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: Brian S. Umpierre [mailto:b.umpierre@gmail.com]

Sent: Monday, November 17, 2014 6:24 PM

To: Kent, Matthew

Cc: LaurenRussell@tntp.com; John Bogdanov; Diane Pritchard (dpritchard@vmbllp.com); Houser, Donald; Rottner, Jason

Subject: Re: Dell/Philips Evidence

[REDACTED]

[REDACTED]

[REDACTED]

On Mon, Nov 17, 2014 at 3:11 PM, Kent, Matthew <Matthew.Kent@alston.com> wrote:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Matthew D. Kent

Senior Associate | Alston & Bird LLP

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EXHIBIT 40

John Bogdanov

From: Lauren Capurro (Russell) <LaurenRussell@tatp.com>
Sent: Monday, December 29, 2014 11:00 AM
To: Dan Birkhaeuser; Jennifer Rosenberg; 'Jennie Anderson'; Sylvie Kern; John Bogdanov; Brian S. Umpierre; Brian Cullen; Qianwei Fu; natalie.kabasakalian@gmail.com; 'Nathan Cihlar'; Bob Gralewski; idiel@sharpmcqueen.com
Cc: Mario N. Alioto
Subject: CRT/Status of work assignments

Follow Up Flag: Follow up
Flag Status: Flagged

Hi Everyone,

Happy Holidays! I hope you all had an enjoyable time over the last week or so, especially after our marathon effort to file the summary judgment oppositions on the 23rd! Boy am I glad that is over! Thanks so much to everyone for all your hard work on those. I think the final briefs were very strong.

I wanted to check in with you all and ask for the status of any assignments you (or any of the people on your team) are working on for this case. I believe that most (if not all) of you have been working on assignments related to the trial exhibit list, depositions and/or designations of testimony, and the summary judgment oppositions. Since all of those are now more or less behind us, I think most of you should be done on CRT assignments for now. Is that right? Other than the foreign team and their work on reviewing translations, is there any continuing doc review? Please let me know ASAP. Thanks.

Lauren

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EXHIBIT 41

John Bogdanov

From: Lauren Capurro (Russell) <LaurenRussell@tatp.com>
Sent: Wednesday, January 21, 2015 10:58 PM
To: John Bogdanov
Cc: lauren russell@tatp.com
Subject: CRT/Defs' submissions

Follow Up Flag: Follow up
Flag Status: Flagged

Hi John,

We are receiving defs' depo designations and trial exhibit list tomorrow? Are you available to help with the review? Thanks.

Lauren

Lauren C. Capurro (Russell)
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EXHIBIT 42

John Bogdanov

From: Lauren Capurro (Russell) <LaurenRussell@tatp.com>
Sent: Monday, March 09, 2015 12:26 PM
To: dbirkhaeuser@bramsonplutzik.com; Jennifer Rosenberg; Jennie Lee Anderson; Diane Pritchard; Natalie Kabasakalian; Brian Cullen; Veronica Besmer; Ike Diel; Brian S. Umpierre; Shinae Kim-Helms; pnovak@milberg.com; Wedgworth, Peggy; Gregory Stamatopoulos; Tarnor, Nathaniel; 'Marvin A. Miller'; Shanti Michaels; Matthew Kuipers; 'Judith Zahid'; 'Qianwei Fu'; Christopher T. Micheletti; John Bogdanov; Bob Gralewski; William Harris; Karina Kosharsky; 'Daniel Hume'; Elizabeth Brehm; ncihlar@strausses.com; Sylvie Kern
Cc: malioto@tatp.com
Subject: CRT

Follow Up Flag: Follow up
Flag Status: Flagged

Good morning!

I have some good news to start your week off! We have final settlements with Panasonic, Hitachi, Philips and Toshiba, and we're working on finalizing our settlement with Samsung SDI. This means we have now settled with all defendants and, assuming we can finalize the SDI settlement soon, we will shortly be moving for preliminary approval of all settlements. The amounts of the settlements will become public at that time.

I don't think that anyone has any current assignments, but to the extent you do, there is no need to do anything more on them.

Thank you to all of you for your hard work on this case. We got a good result for the class. We'll be in touch again soon regarding getting the case wrapped up.

Best,

Lauren

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